

Integrated Impact Assessment (IIA) (including equality, environment, health, human rights, socio-economic Duty, United Nations Conventions the Rights of the Child and Welsh language)

Name of Policy or Practice	Consideration of Variation of Council Tax Premium Scheme for Second Homes and Long-term Empty Properties		
Responsible Officer (responsible for the Policy or Practice)	Chief Officer, Governance		
Service / Portfolio	Governance - Revenues	Start Date of Assessment	6 th July 2022

Name of officer(s) (and partners) completing the IIA		
Name(s)	Job Title(s)	Signature(s)
David Barnes	Revenues and Procurement Manager	
Andrew Taylor	Lead Revenue Officer	

*Consider including only job titles when publishing

Document Version	Revision Date	Briefly Describe the Changes

IIA Approved by Responsible Officer / Portfolio / Service / Committee	
Date IIA Concluded	
Name	
Job Title	
Signature	

Introduction

This document is a multi-purpose tool ensuring the appropriate steps are taken to comply with the [Public Sector Equality Duty \(PSED\)](#) Equality Impact Assessment legislation and to demonstrate that we have shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the [Socio-economic Duty](#). It also incorporates [Welsh Language impacts](#), environmental and bio-diversity impacts, health impacts and United Nations Conventions Rights of a Child.

When we plan to introduce a new, or revise an existing, policy, strategy or practice, develop a new service, make changes or cuts to a service or make strategic decisions, we are required to consider if the decision would have a disproportionate impact on people sharing one or more [protected characteristic](#) or whether it could create inequalities of outcome around socio-economic disadvantage. Where this is likely to be the case, we must take appropriate action. The IIA process is not intended to prevent us doing things but to ensure we have considered the impact. It helps us focus on the actions we can take to remove and/or mitigate any disproportionate or discriminatory impact and introduce measures to advance equality of opportunity.

To comply with the PSED [General Duty](#) and [Socio-economic Duty](#), we must have 'due regard' (or consciously consider the need) to: eliminate discrimination, advance equality of opportunity and foster good relations and to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage. The greater the relevance and potential impact, the higher the regard required by the duty. The General Duty will be more relevant to some functions than others and they may also be more relevant to some protected characteristics than others. Our duty must be exercised with rigour, an open mind and considered at a time when it can make a difference to our decisions. Policies with high relevance, such as strategic budgetary decisions, grant-making programmes, changes to service delivery (including withdrawal or reorganisation of services), and recruitment or pay policies should always be subject to an assessment for impact. For further guidance see [EHRC Assessing Impact Guidance](#). Our duty to comply with this legislation cannot be delegated.

This form should demonstrate the steps taken to carry out the assessment including relevant engagement/consultation, the information taken into account, the results of the assessment and any decisions taken in relation to those results. The IIA should be published where it shows a substantial (or likely) impact on our ability to meet the PSED.

Benefits of undertaking an IIA:

- Gain a better understanding of those who may be impacted by the policy or practice
- Better meet differing needs and become more accessible and inclusive
- Enable planning for success – identifies potential pitfalls and unintended consequences before any damage is done
- Enable improved planning that will make decisions proactive rather than reactive, avoid having to reverse decisions which could have cost and reputational implications
- Demonstrate decisions are thought through and have taken into account the views of those affected
- Enable us to manage expectations by explaining the limitations within which we are working (e.g. budget)

- Help avoid risks and improve outcomes for individuals
- Remove inappropriate or harmful practices and eliminate institutional discrimination
- Ensure we put Welsh and English Language on an equal footing. and that decisions are made that safeguard and promote the use of the Welsh language
- Improve and protect health, maximising health benefits and reducing health risks
- Be more open and transparent
- Use our resources more effectively

Whilst this document may seem lengthy, as well as containing the necessary steps in the process, it also contains guidance notes in the key areas to assist you in undertaking the IIA. Additional links to further information are also included for assistance. Further information can be found on NHS/ WLGA PSED/ EIA [here](#).

The Welsh Government¹ guidance states that:

Impact assessment prompts and guides us to gather, and if necessary, seek evidence so as to improve the development of a policy or delivery plan, or inform a change of direction in policy or delivery. It is a methodology to help in the development and implementation of policy, rather than templates with tick boxes and checklists.

Integrated Impact Assessment Steps

- Step 1 - Identify the Main Aims and Objectives of the Policy or Practice
- Step 2 - Data, Engagement and Assessing the Impact
- Step 3 - Procurement and Partnerships
- Step 4 - Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice
- Step 5 - Decision to Proceed
- Step 6 - Actions and Arrangements for Monitoring Outcomes and Reviewing Data
- Step 7 - Publishing the Integrated Impact Assessment

Important Note to Completing Officer(s):

It is important that the IIA is completed when the policy or practice is being developed so that the findings from the IIA can be used to influence and shape the policy or practice. It is recommended as a minimum, it is completed by a lead officer who is responsible for the policy or practice, a subject matter expert and a critical friend with at least one who has received formal IIA training. This document needs to be presented to the decision makers along with the draft policy or practice as part of the decision making process.

¹ Welsh Government Integrated Impact Assessment Guidance

Where you are developing a high level strategy or plan that does not contain sufficient detail to show how it will impact on individuals or groups (i.e. where there will be plans and actions sitting beneath the strategy that will determine this), you should still undertake the Impact Assessment. You may also need to complete additional IIA(s) on the plans and actions beneath the high level strategy. This will ensure you demonstrate that you have shown due regard to complying with the General Duty, the Public Sector Equality Duty, the Welsh Language Standards the Socio-economic Duty, the Human Rights Act, the United Nations Conventions, Rights of the Child.

If your policy or practice is as a result of a UK, Welsh Government or Local Authority wide directive, you should still assess the impact of this locally to identify any differential impact due to local difference.

You should consider whether other events, e.g. COVID-19, Brexit, Black Lives Matter, etc. have highlighted or exacerbated inequalities that need to be addressed as you work through the IIA.

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? *(Please double click on the relevant box(es) (X) and select 'checked' as appropriate)*

- New and revised policies, practices or procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff, e.g. early years provision, care, education
- Efficiency or saving proposals, e.g., resulting in a change in community facilities, activities, support or employment opportunities
- Setting budget allocations for new financial year and strategic financial planning
- Decisions affecting service users, employees or the wider community including (de)commissioning or revised services
- New project proposals affecting staff, communities or accessibility to the built environment, e.g. new construction work or adaptations to existing buildings, moving to on-line services, self-service, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation (refer to any national IIA and consider local impact)
- Strategic directive and intent, including those 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)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other please explain in the box below:

2. What are the overall aims, objectives and intended outcomes of the policy or practice?

When considering whether or not to amend the premium levels, the discretion given to local authorities to charge a premium is intended to be a tool to help local authorities to:

- bring long-term empty homes back into use to provide safe, secure and affordable homes; and
- increase the supply of affordable housing; and
- enhance the sustainability of local communities.

3. Who are the main consultative groups (stakeholders)?

Note: Consider communities of interest or place (where people are grouped together because of specific characteristics or where they live)

Every household within Flintshire and those who live outside Flintshire, but own a property in the Residential Rating, but especially those impacted by the proposed changes i.e. those who have second homes and long term empty properties within the county who would be potentially impacted by any variation to the current premium scheme.

The scheme was open to all the general public to ensure anyone who currently or in the future may be subject to the premium were able to respond including groups such as first time buyers.

Therefore a full public consultation was undertaken for a period of 4 weeks from 8th November 2021 to 6th December 2021 to capture the views of all potentially affected parties with the Council receiving 522 full or partial responses in both English and Welsh.

4. Is the policy related to, influenced by, or affected by other policies or areas of work (internal or external), e.g. strategic IIAs if this is an operational IIA and vice versa?

Note: Consider this in terms of statutory requirements, local policies, regional (partnership) decisions, national policies, welfare reforms.

This is linked to local and national objectives to bring empty houses and periodically occupied properties back into housing stock for local communities.

STEP 2 - Data, Engagement and Assessing the Impact

When completing this section, you need to consider if you have sufficient information with which to complete your IIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the IIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. The socio economic duty also requires us to **take into account the voices of those in the community including those with lived experience of socio economic disadvantage**. You should undertake engagement with communities of interest or communities of place to understand if they are more affected or disadvantaged by your proposals. This needs to be proportionate to the policy or practice being assessed. Remember that stakeholders can also include our own workforce as well as partner organisations.

Before carrying out particular engagement activities, you should first look to data from recent consultations, engagement and research. This could be on a recent related policy or recent assessments undertaken by colleagues or other sources, e.g., [Is Wales Fairer?](#), [North Wales Background Data Document](#), Info Base Cymru, WIMD. This can help to build confidence among groups and communities, who can see that what they have said is being acted on. If you have very little or no information from previous engagement that is relevant to this IIA, you should undertake some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each

protected group. It is seldom acceptable to state simply that a policy will universally benefit/disadvantage everyone, and therefore individuals will be affected equally whatever their characteristics. The analysis should be more robust than this, demonstrating consideration of all of the available evidence and addressing any gaps or disparities. Specific steps may be required to address an existing disadvantage or meet different needs.

The Gunning Principles, established from past court cases, can be helpful in ensuring we apply fairness in engagement and consultation:

- 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.

5. Have you complied with the duty to engage as described above and are you sufficiently informed to proceed?

Yes No *(please cross as appropriate X)*

6. If Yes, what engagement activities did you undertake and who with?

We undertook a full 4 week consultation with the general public which was promoted on our website and via press release. The Council received 522 full or partial responses in both English and Welsh from across the spectrum of the public from both living inside and outside of Flintshire.

7. If No, you may wish to consider pausing at this point while you undertake (further) engagement activities which you can include in the action plan below. Please incorporate any information obtained from this additional activity in the boxes in question 8.

Action	Dates	Timeframe	Lead Responsibility	Information added to IIA (✓)

8. **What information do you hold about the impact on each of the following characteristic and statutory considerations / duties from your experience of current service delivery and recent engagement or consultation?** Include any additional relevant data; research and performance management information; surveys; Government, professional body or organisation studies; Census data; Is Wales Fairer? (EHRC² data); complaints/compliments; service user data and feedback; inspections/ audits; socio-economic data including WIMD³ data. You may wish to include sub-headings showing where each element of your data has come from, e.g. national data, local data, organisation data, general or specific engagement exercises, etc.

Consider any positive or negative impact including trends in data, geography (urban or rural issues), demography, access issues, barriers, etc. Also include any areas where there are inequalities of outcome resulting from socio-economic disadvantage or other relevant issues identified by communities of interest or communities of place (i.e. where stakeholders, service users, staff, representative bodies, etc. are grouped together because of specific characteristics or where they live) and any issues identified for people living in less favourable social and/or economic circumstances.



Prompts for
Equality Impact Asses

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
Age	<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.</p> <p>This would allow more opportunity for those presently seeking a home and currently sharing with another household to obtain a</p>	Positive	<p>Older People Children Young People Working Age People Young Families Demographics</p>

² Equality and Human Rights Commission

³ Wales Index of Multiple Deprivation

Equality and Human Rights

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
	home of their own. Those finding themselves in this position may predominantly be first time buyers or younger people and increasing the housing stock would provide more opportunity local young residents to obtain their own home to own or rent.		NB: Where children / young people are affected complete the Childrens Rights Checklist United Nations Convention on the Rights of the Child (UNCRC) Caring responsibilities
Disability	<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.</p> <p>People who have a disability may need to find alternative more suitable accommodation at short notice. An increase in available housing stock would increase their choice and opportunity to move for local disabled residents.</p>	Positive	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities, induction loops, signage Access to communication methods, use of British Sign Language, Easy Read Carers Dietary requirements Other Long Term Health Conditions United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
Gender Reassignment	The policy outcome would have no specific impact to a person due only to gender reassignment.	No Impact	A person who proposes to, starts or has changed their gender identity Transgender Appropriate language use, i.e. gender neutral language, appropriate pronouns Gender neutral changing facilities and toilets confidentiality

Equality and Human Rights

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
Marriage & Civil Partnership	<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.</p> <p>This would increase the opportunities for those who are married or in a civil partnership to buy or rent their own home.</p>	Positive	<p>Marital status Civil Partnership status Reference to partners and not assuming husband and wife relationships /terminology</p>
Pregnancy & Maternity	<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.</p> <p>This would increase the opportunities for those who are pregnant or on maternity leave to have more options to a more suitable home as their change in personal circumstances requires them to do so.</p>	Positive	<p>Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers Access to breast feeding facilities Dress codes/uniforms- do they accommodate pregnant women</p>
Race	<p>The policy outcome would have no specific impact to a person due only to race. It would however increase the availability of housing in Flintshire and potentially attract more diversification in our community.</p>	Neutral	<p>Consider Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Use of plain language Refugee / Asylum Seekers Migrants Positive Action Awareness events United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)</p>
Religion & Belief	<p>The policy outcome would have no specific impact to a person due only to religious belief.</p>	Neutral	<p>Faith Communities Non Beliefs Dietary requirements Vegetarianism/Veganism</p>

Equality and Human Rights

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
			Other philosophical beliefs Dress code/uniforms Religious festivals/activities Buildings – access to prayer room facilities
Sex	The policy outcome would have no specific impact to a person due only to their sex.	Neutral	Men / Women Gender Identity Toilet facilities/baby changing Childcare Gender Pay Gap Sex workers United Nations Convention on the Elimination of All Forms of Discrimination against Women (UNCEDAW)
Sexual Orientation	The policy outcome would have no specific impact to a person due only to sexual orientation.	Neutral	Gay Lesbian Bi-sexual Heterosexual Terminology - Avoid making assumptions about a person's sexual orientation use gender-neutral terms such as partner(s). Confidentiality about sexuality Further resources available from Stonewall Cymru
Socio-economic Considerations- Reducing inequalities caused by socio-economic disadvantage	If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.	Positive	People living in less favourable social and economic circumstances than others in the same society. Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries.

Equality and Human Rights

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
	<p>Those that are subject to the premium as either second home owners or owners of long-term empty properties are generally not a group subject to socio-economic disadvantage.</p> <p>The evidence of our consultation indicates a large percentage of owners of long term empty properties would sell them, rent them or bring them up to a higher standard. All of these outcomes will bring a degree of “levelling up” with those with a primary residence and a long term empty residence ensuring that the empty residency is instead brought into use for a potentially homeless, vulnerable or socio-economically disadvantaged person/household.</p> <p>In addition to providing additional housing stock in Flintshire, maintaining or increasing the premium also increases income to the authority by raising additional council tax.</p> <p>These additional funds can reduce the burden of council tax across residents of all socio economic standing, but also be used to fund initiatives designed specifically to support socio-economically disadvantaged people with all aspects of their life.</p>		<p>‘Intersectionality’ issues - where identity compounds socio-economic status, e.g., single parents (often women), disabled people, some BAME groups. Examples include lower levels of good health, lower paid work, poorer educational attainment and an increased risk of being a victim of crime</p> <p>Further resources available from Welsh Government including examples of inequalities of outcome caused by socio-economic disadvantage</p>  <p>Inequalities of outcome.pdf</p>
<p>Human Rights</p>	<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.</p>	<p>Positive</p>	<p>See Human Rights Articles below. https://humanrightstracker.com/en/ on EHRC website</p>

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
	This will support the Human Rights Act Article 11.1 <i>“The right to choose one’s residence, to determine where to live and to freedom of movement.”</i>		
Other (please state) Homeless	<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.</p> <p>This would contribute to allowing Flintshire to reduce issues of being homeless or living in unsuitable accommodation.</p>	Positive	E.g., Modern Slavery, Safeguarding, Other COVID effects, Carers, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless
Welsh Language			
Welsh Language	<p>The outcome of the policy if determined to maintain or increase the premium would continue to ensure that communities have only small numbers of long term empty properties and properties that are only occupied periodically as second homes.</p> <p>This would ensure that there are more local people living within Flintshire in previously empty or periodically occupied homes, promoting a greater use of the Welsh Language in the community.</p>	Positive	<p>Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information.</p> <p>Availability of Welsh speaking employees</p> <p>Technology</p> <p>Rights of individuals to ask for WL services.</p> <p>Impact on Welsh speaking communities, including:</p> <p>Positive / negative effects on opportunities to use the WL.</p> <p>Possible changes to number/percentage of Welsh speakers</p> <p>Migration</p>

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
			Job opportunities / Staffing changes. Training needs and opportunities Availability of Welsh medium education.  20200921 DG S Policy making stand

Human Rights Act 1998 <ul style="list-style-type: none"> • Article 2 Right to life • Article 3 Freedom from torture and inhuman or degrading treatment • Article 4 Freedom from Slavery and forced labour • Article 5 Right to liberty and security • Article 6 Right to a fair trial • Article 7 No punishment without law 	<ul style="list-style-type: none"> • Article 8 Respect for private life, family, home and correspondence • Article 9 Freedom of thought, belief and religion • Article 10 Freedom of expression • Article 11 Freedom of Assembly and association • Article 12 Right to marry and start a family • Article 13 Right to access effective remedy if rights are violated • Article 14 Protection from discrimination
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Environment and Biodiversity			
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
Reducing greenhouse gas emissions	If long-term empty properties are incentivised to be brought back into use by maintaining or increasing the premium, this would ensure that properties that require investment are modernised including the fitting of more modern and efficient heating, insulation and appliances.	Positive	Will energy need be met through renewable sources? Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? * Will it reduce ozone depleting emissions? Will it reduce emissions through retrofitting new technology?

Environment and Biodiversity

	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
			Will it reduce heat island effects on people and property?
Plan for future climate change	The policy would not impact on the plan for future climate change.		Will it minimise flood risk from all sources of flooding? * Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? Will it reduce combined sewer overflow events? Will it encourage the re-use of resources? Will it encourage sustainable construction methods and procurement? Will it encourage water efficiency and drought resilience?
Pollution: air, water/ soil/noise and vibration and emissions	If long-term empty properties are incentivised to be brought back into use by maintaining or increasing the premium, this would ensure that properties that are perhaps empty and derelict and causing harm to the environment and visual amenity of an area are brought up to a good standard.	Positive	Will it reduce combined sewer overflow events? Will it improve air quality? * Will it reduce emissions of key pollutants? Will it reduce noise concerns and noise complaints? Will it reduce noise levels?
Integrating biodiversity into decision making	The policy would not impact on integrating biodiversity into decision making.		Have you considered the impacts and opportunities for action for biodiversity at early stages Are the impacts of procurement on biodiversity considered? Are products sourced sustainably? Have the wider benefits of improved biodiversity been considered, flood prevention, health and wellbeing, recreation? Can you link with other strategies and initiatives for biodiversity e.g. FCC Environment and Sustainability policy, FCC Section

Environment and Biodiversity			
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
			6 Plan, FCC Urban tree and woodland plan?
Increasing the resilience of our natural environment?	No impact.		Does the proposal work with nature and consider the use of nature based solutions first and foremost? Does your proposal support the creation of new habitats (in addition to any mitigation or compensation habitat) Does it contribute to the restoration of degraded habitats? Does it improve site management to improve nature value?
Improving understanding and raise awareness of the importance of biodiversity	Any decision to maintain or increase the premium would provide a disincentive for a property to be left empty long-term and instead be used as a primary residency. The outside space of a property that is lived in is more likely to be managed in a respectful way to encourage biodiversity.	Positive	Can your proposal promote understanding of biodiversity? Can the delivery of public goods and services such as social care, community health and recreation promote biodiversity? Can your proposal promote biodiversity with partners/beneficiaries
Encouraging resource efficiency (energy, water, materials and minerals)	If long-term empty properties are incentivised to be brought back into use by maintaining or increasing the premium, this would ensure that properties that require investment are modernised including the fitting of more modern and efficient heating, insulation and appliances. This would mean that resources are protected as the property would use less energy and any remedial works done e.g. fixing of leaks.	Positive	Will it reduce water consumption and improve water efficiency? Will it reduce energy consumption? *
Reducing waste production and	It could be reasonably expected that the outcome of the policy would encourage more recycling from permanent residents who	Positive	Will it reduce consumption of materials and resources? Will it reduce household waste?

Environment and Biodiversity

	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
increase recycling, recovery and re-use of waste	are familiar and educated in local recycling collections and centres rather than those in periodically occupied properties.		Will it increase recycling, recovery and re-use? Will it reduce construction waste?
Reducing need to travel and promote sustainable forms of transport	By having more available housing, this allows local people to live and work in the community they wish, reducing the requirement to travel long distances for work and social purposes.	Positive	Will it reduce volumes of traffic? Will it encourage walking and cycling?*
Improving the physical environment: housing, public space, access to and quality of green space	<p>By maintaining a premium and potentially increasing the premium would ensure that empty properties in communities are not left to deteriorate into a state of disrepair improving the aesthetics of the area.</p> <p>Furthermore, it would also discourage owners from allowing properties to remain empty in the long term and either selling them or renting them to local people, increasing the number of homes available to local people to rent or buy.</p> <p>This was supported in the public consultation where owners of properties that are currently empty suggested they would sell the property providing opportunity for it to become a residential dwelling once more.</p>	Positive	<p>Will it reduce litter?</p> <p>Will it enhance the quality of public realm?</p> <p>Will it improve access and mobility for all equality groups</p> <p>Will it improve open space?</p> <p>Will it improve landscape character?</p> <p>Will it minimise development on Greenfield sites</p>
Protecting and enhancing the historic environment and architectural, archaeological	The policy would not affect this characteristic.		<p>Will it protect heritage sites and cultural value?</p> <p>Will it protect strategic views?</p> <p>Will it protect listed buildings and their settings?</p> <p>Will it help preserve, enhance and record archaeological features and their settings?</p>

Environment and Biodiversity			
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
and cultural heritage			

Health			
Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from
			 HIA_Tool_Kit_V2_W EB.pdf
Lifestyles	The policy will not affect this characteristic.		Diet Physical activity Use of alcohol, cigarettes, non-prescribed drugs Sexual activity Other risk-taking activity
Social and community influences on health	Bringing properties back into use and increasing local housing stock means that families can continue to live in the communities in which they grew up creating close family networks and a sense of belonging.	Positive	Family organisation and roles Citizen power and influence Social support and social networks Neighbourliness Sense of belonging Local pride Divisions in community Social isolation Peer pressure Community identity Language/Cultural and spiritual ethos Racism Other social exclusion

Health

Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from  HIA_Tool_Kit_V2_W EB.pdf
Mental well-being	The policy will not affect this characteristic		Does this proposal support sense of control? Does it enable participation in community and economic life? Does it impact on emotional wellbeing and resilience?
Living/environmental conditions affecting health	Properties that are left empty long-term often fall into disrepair and can be a blight on the attractiveness of an area. By incentivising properties to be brought back into use improves the appearance of communities and provides incentive for others to maintain their properties to a higher standard.	Positive	Built environment Neighbourhood design Housing Indoor environment Noise Air and water quality Attractiveness of area Green space Community safety Smell/odour Waste disposal Road hazards Injury hazards Quality and safety of play areas
Economic conditions affecting health	The policy will not affect this characteristic.		Unemployment Income Economic inactivity <input type="checkbox"/> Type of employment Workplace conditions
Access and quality of services	The policy will not affect this characteristic.		Medical services

Health			
Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from  HIA_Tool_Kit_V2_W EB.pdf
			Other caring services Shops and commercial services Public amenities Transport including parking Education and training Information technology
Macr-economic, environmental and sustainability factors	The policy will not affect this characteristic.		Government policies Gross Domestic Product Economic development Biological diversity Climate

United Nations Conventions on the Rights of the child			
	Relevant data or information	Positive and/or negative impacts	Prompts (not exhaustive)
Relevant Article	None identified	N/A	Summary of conventions

There are four articles in the convention that are seen as special. They're known as the "General Principles" and they help to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:	
Article 2	The Convention applies to every child without discrimination, whatever their ethnicity, sex, religion, language, abilities or any other status, whatever they think or say, whatever their family background
Article 3	(best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children.
Article 6	(life, survival and development) Every child has the right to life. Governments must do all they can to ensure that children survive and develop to their full potential

Article 12	2 (respect for the views of the child) Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example during immigration proceedings, housing decisions or the child's day-to-day home life
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9. Are there any data or information gaps and if so what are they and how do you intend to address them?

There are not considered to be any data gaps in this assessment as a full public consultation was undertaken on the specific proposal to potentially vary the present Council Tax Premium Policy. The engagement process was carefully planned, administered and communicated to ensure maximum engagement and ensure there are no gaps in data or sections of the community not consulted.

A 4 week consultation with the general public was undertaken from 8th November 2021 to 6th December 2021 which was promoted on our website and via press release. The Council received 522 full or partial responses in both English and Welsh from across the spectrum of the public from both living inside and outside of Flintshire.

Note: If it is not possible to obtain this information now, you should include this in your action plan in Step 6 so that this information is available for future IIAs.

10. How does your proposal ensure that you are working in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011), to ensure the Welsh language is not treated less favourably than the English language, and that every opportunity is taken to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

Our consultation results show that 23.8% of respondents consider that long term empty properties and second homes have a negative effect on the treatment of the Welsh Language compared with just 2.7% who felt they have a positive impact. Therefore any decision to maintain for increase the level of premium would contribute to fewer empty or periodically used properties and allow for the development of Welsh language in communities.

11. If this IIA is being updated from a previous version of a similar policy or practice, were the intended outcomes of the proposal last time achieved or were there other outcomes? (Please provide details, for example, was the impact confined to the people you initially thought would be affected, or were other people affected and if so, how?)

Not applicable

12. **What is the cumulative impact of this proposal on different protected groups when considering other key decisions affecting these groups made by the organisation?** (You may need to discuss this with your Chief Officer or Cabinet Member to consider more widely if this proposal will affect certain groups more adversely because of other decisions the organisation is making, e.g., financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc.)

The cumulative impact of any decision to maintain or increase the premium will continue to ensure owners of long-term empty properties and second homes into use and increase the availability of local housing for local residents – this links with one of the Strategic Priorities of the Council as set on the Council Plan:

Theme: Affordable and Accessible Housing

Priority: Empty Properties – bringing empty homes back into use to enhance the local housing market and improve our local communities.

13. **How does this proposal meet with each of the 7 goals of the Well-being of Future Generations (Wales) Act 2015?**

For more information, please see: <https://futuregenerations.wales/about-us/future-generations-act/>

A Prosperous Wales – having more available housing would encourage local residents and talent to stay in the county/wales and contribute to future prosperity. Having a capped level of premium still encourages visitors and non-residents to come to the county, as they will want to use their second homes more often to obtain "value" and will bring their spending power to the county more frequently.

A Resilient Wales – by addressing the issue of shortage of housing stock, this will ensure Wales and the County are in a strong position to be able to provide suitable housing to residents who wish to live there meaning they do not have to seek alternative solutions outside the county/country.

A More Equal Wales – the policy will proactively support those at a socio-economic disadvantage to secure themselves a home in the county as owners of long-term empty properties will have more incentive to make them suitable for sale and let into the local housing market. Therefore those who have an empty property who are typically not at a socio-economic disadvantage will be encouraged to take action.

A Healthier Wales – adequate provision and availability of housing is recognised as a key enabler to good health.

A Wales of Cohesive Communities – having more properties lived in permanently rather than being left empty or used as holiday homes will ensure communities remain vibrant and cohesive without the potential blight of unoccupied properties. The premium scheme could have a positive impact by encouraging owners to bring empty properties back into use and thereby helping to develop strong and cohesive communities by addressing housing needs.

A Wales of Vibrant Culture and Thriving Welsh Language – the policy disincentives properties being left empty or being periodically occupied and instead encourages properties to be lived in full time as a primary residence. Having a higher percentage of properties being permanent residences will encourage the uptake, maintenance of the Welsh language in the community. It will also provide more opportunity for local residents to have access to housing stock when they require in order to stay living local and contribute to the local culture of the area rather than migrating away.

14. How does this proposal meet with the 5 ways of working of the Well-being of Future Generations (Wales) Act 2015 ?

For more information, please see: <https://futuregenerations.wales/about-us/future-generations-act/>

Long term, Integration, Involvement, Collaboration, Prevention

Any potential increase to the premium will not bring overnight radical solutions to the shortage of housing in Flintshire or Wales, however it will dovetail and support other initiatives as part of a long-term integrated plan to ensure we make maximum use of existing housing stock in addition to new development to encourage inward investment in collaboration with strategic partners. This will lead to a focus on the prevention of homelessness and overcrowding in homes in Flintshire.

15. Describe any intended negative impact identified and explain why you believe this is justified (for example, on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not or because of an objective justification¹ or positive action²)

No negative impact on protected characteristics

Note¹: Objective Justification - gives a defence for applying a policy, rule or practice that would otherwise be unlawful direct or indirect discrimination. To rely on the objective justification defence, the employer, service provider or other organisation must show that its policy or rule was for a good reason – that is 'a proportionate means of achieving a legitimate aim'. A **legitimate aim** is the reason behind the discrimination which must not be discriminatory in itself and must be a genuine or real reason, e.g., health, safety or welfare of individuals. If the aim is simply to reduce costs because it is cheaper to discriminate, this will not be legitimate. Consider if the importance of the aim outweighs any discriminatory effects of the unfavourable treatment and be sure that there are no alternative measures available that would meet the aim without too much difficulty (proportionate) and would avoid the discriminatory effect.

Note²: Positive Action - Where an employer takes specific steps to improve equality in the workplace to address any imbalance of opportunity, lessen a disadvantage or increase participation in a particular activity, for example, increasing the number of disabled people in senior roles where they are under-represented by targeting specific groups with job adverts or offering training to help create opportunities for certain groups. The public sector is expected to consider the use of positive action to help them comply with the Public Sector Equality Duty.

16. Could any of the negative impacts identified amount to unlawful discrimination but are perceived to be unavoidable (e.g., reduction in funding)?

Yes No Not Sure *(Please double click on the relevant box (X) and select 'checked' as appropriate)*

17. If you answered Yes or Not Sure to question 15, please state below, which protected group(s) this applies to and explain why (including likely impact or effects of this proposed change)

18. If you answered No to question 15, are there any barriers identified which amount to a differential impact for certain groups and what are they?

None

STEP 3 - Procurement and Partnerships

The Public Sector Equality Duty (PSED) requires all public authorities to consider the needs of protected characteristics when designing and delivering public services, including where this is done in partnership with other organisations or through procurement of services. The Welsh Language Standards also require all public authorities to consider the effects of any policy decision, or change in service delivery, on the Welsh language, which includes any work done in partnership or by third parties. We must also ensure we consider the Socio-economic Duty when

planning major procurement and commissioning decisions to consider how such arrangements can reduce inequalities of outcome caused by socio-economic disadvantage.

When procuring works, goods or services from other organisations (on the basis of a relevant agreement), we must have due regard to whether it would be appropriate :

- for the award criteria for that contract to include considerations to help meet the General Duty (to eliminate discrimination, promote equality of opportunity and foster good relations);
- to stipulate conditions relating to the performance of the contract to help meet the three aims of the General Duty.

This only applies to contractual arrangements that are “relevant agreements” which means either the award of a ‘public contract’ or the conclusion of a ‘framework agreement’, both of which are regulated by the Public Sector Directive (Directive 2004/18/EC) which regulates the specified EU thresholds. Further information can be found [here](#).

We must consider how such arrangements can improve equal opportunities and reduce inequalities of outcome due to protected characteristics and caused by socio-economic disadvantage, particularly on major procurement and commissioning decisions. The PSED applies to the work that private sector organisations undertake when delivering a public function on our behalf. We therefore need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty under Section 149 of the Equality Act 2010. In the same way, the Welsh Language Standards applies to any work undertaken on behalf of, and in the name of, public bodies that are themselves subject to the Standards, and so consideration should be given to how these requirements are monitored and communicated through the procurement documents. The Socio Economic Duty does not pass to a third party through procurement, commissioning or outsourcing. Therefore when we work in partnership with bodies not covered by the Socio Economic Duty, the duty only applies to us as the relevant public body.

19 Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes No (Please double click on the relevant box (X) and select ‘checked’ as appropriate)

If No, please proceed to Step 4

20. If Yes, what steps will you take to comply with the General Equality Duty, Human Rights and Welsh Language Legislation and the Socio-Economic Duty in regard to procurement and/or partnerships? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation, showing how promotion of equality may be built into individual procurement projects

Partnerships

Be clear about who is responsible for :

- Equality Monitoring relevant data

- On what you based your decisions in the award process, including consideration of ethnical employment and supply chain code of practice
- Ensure that contract clauses cover the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and socio-economic requirements as well as Welsh Language Duties (remember that any duties from the Welsh Language Measure 2011 and Welsh Language Standards are also applicable to services provided on your behalf under contract by external bodies).
- Performance and Monitoring measures are included to monitor compliance, managing and enforcing contracts

- Equality Impact Assessments
- Delivering the actions from the IIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners
- Demonstrating due regard to the Public Sector Equality Duty and the Socio-Economic duty

Not applicable

STEP 4 - Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

21. **When considering proportionality, does the policy or practice have a significantly positive or negative impact or create inequalities of outcome resulting from socio-economic disadvantage?**
 (Please give brief details)

Significantly positive impact	Significantly negative impact
<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market increasing the supply of housing stock within the county.</p> <p>Those that are subject to the premium as either second home owners or owners of long-term empty properties are generally not a group subject to socio-economic disadvantage.</p> <p>The evidence of our consultation indicates a large percentage of owners of long term empty properties would sell them, rent them or bring them up to a higher standard. This would bring properties into use for a potentially homeless, vulnerable or socio-economically disadvantaged person/household.</p>	

<p>In addition to providing additional housing stock in Flintshire, maintaining or increasing the premium also increases income to the authority by raising additional council tax.</p> <p>These additional funds can reduce the burden of council tax across residents of all socio economic standing, but also be used to fund initiatives designed specifically to support socio-economically disadvantaged people with all aspects of their life.</p> <p>Finally, increasing the supply of housing in Flintshire would prevent migration of Flintshire residents to other areas allowing close family and community cohesion to continue.</p>	
<p>If the present Premium Scheme set at 50% is maintained or increased it is expected that more properties not presently occupied on a residential basis would become available to the sales or rental market.</p> <p>This will support the Human Rights Act Article 11.1 <i>“The right to choose one’s residence, to determine where to live and to freedom of movement.”</i></p>	

22. It is important that you record the mitigating actions you will take in developing your final policy/practice draft. Record here what measures or changes you will introduce to the policy or practice in the final draft which could reduce or remove any unlawful or negative impact or disadvantage and/or improve equality of opportunity/introduce positive change; or reduce inequalities of outcome resulting from socio-economic disadvantage? (This could also inform the Action Plan in Q30)

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the Policy/Practice	Completed (✓)
Not applicable		

23. Will these measures remove any unlawful impact or disadvantage?

Yes No (Please double click on the relevant box (X) and select 'checked' as appropriate)

24. If No, what actions could you take to achieve the same goal by an alternative means?

Not applicable

25.

Wh

at measures or changes in the following important legislative areas have you included to strengthen or change the policy/practice:

- a) to foster good relations and advance equality of opportunity as covered by the General Duty in the Equality Act 2010;
- b) to reduce inequalities of outcome as a result of socio-economic disadvantage;
- c) to increase opportunities to use the Welsh language and in treating the Welsh language no less favourably than the English language as set out in the Welsh Language (Wales) Measure 2011 and reduce or prevent any adverse effects that the policy/practice may have on the Welsh language?

Not applicable

26. Do you have enough information to make an informed judgement?

Yes No (Please double click on the relevant box (X) and select 'checked' as appropriate)

27. If you answered Yes, please justify:

We have not identified any negative impacts with respect to the detailed characteristics.

28. If you answered No, what information do you require and what do you need to do to make a decision?

(Note: Should data collection be included in the action plan (Step 6)?)

Not applicable

[You may need to stop here until you have obtained the additional information]

STEP 5 - Decision to Proceed

29. Using the information you have gathered in Steps 1 – 4 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(Please double click on the relevant box (X) and select 'checked' as appropriate)

Decision	
<input type="checkbox"/> Yes	Continue with policy or practice in its current form
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement or to remove any areas of adverse impact identified in Step 4
<input checked="" type="checkbox"/> Yes	Continue with the plan as any detrimental impact can be justified
<input type="checkbox"/> No	Do not continue with this policy or practice as it is not possible to address the adverse impact. Consider alternative ways of addressing the issues.

30. Are there any final recommendations in relation to the outcome of this Equality Impact Assessment?

No

STEP 6 - Actions and Arrangements for Monitoring Outcomes and Reviewing Data

The IIA process is an ongoing one that doesn't end when the policy/practice and IIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced or amended this new policy or practice. If you do not hold relevant data, then you should be taking steps to rectify this in your action plan. To review the EHRC guidance on data collection you can review their [Measurement Framework](#).

31. Please outline below any actions identified in Steps 1-5 or any additional data collection that will help you monitor your policy/practice once implemented:

Action	Dates	Timeframe	Lead Responsibility	Add to Service Plan (✓)

32. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice including timescales for when it should be formally reviewed:

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)

STEP 7 - Publishing the Integrated Impact Assessment

Please arrange for this completed IIA to be agreed by your Chief Officer and arrange for translation and publishing with a copy sent to Stephanie Aldridge: stephanie.aldridge@flintshire.gov.uk.