



Future Northants

Local Government Reorganisation Proposal

Equalities Impact Assessment

August 2018





Opinion Research Services | The Strand, Swansea SA1 1AF
Jonathan Lee | Kester Holmes | Scott Lawrence
enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

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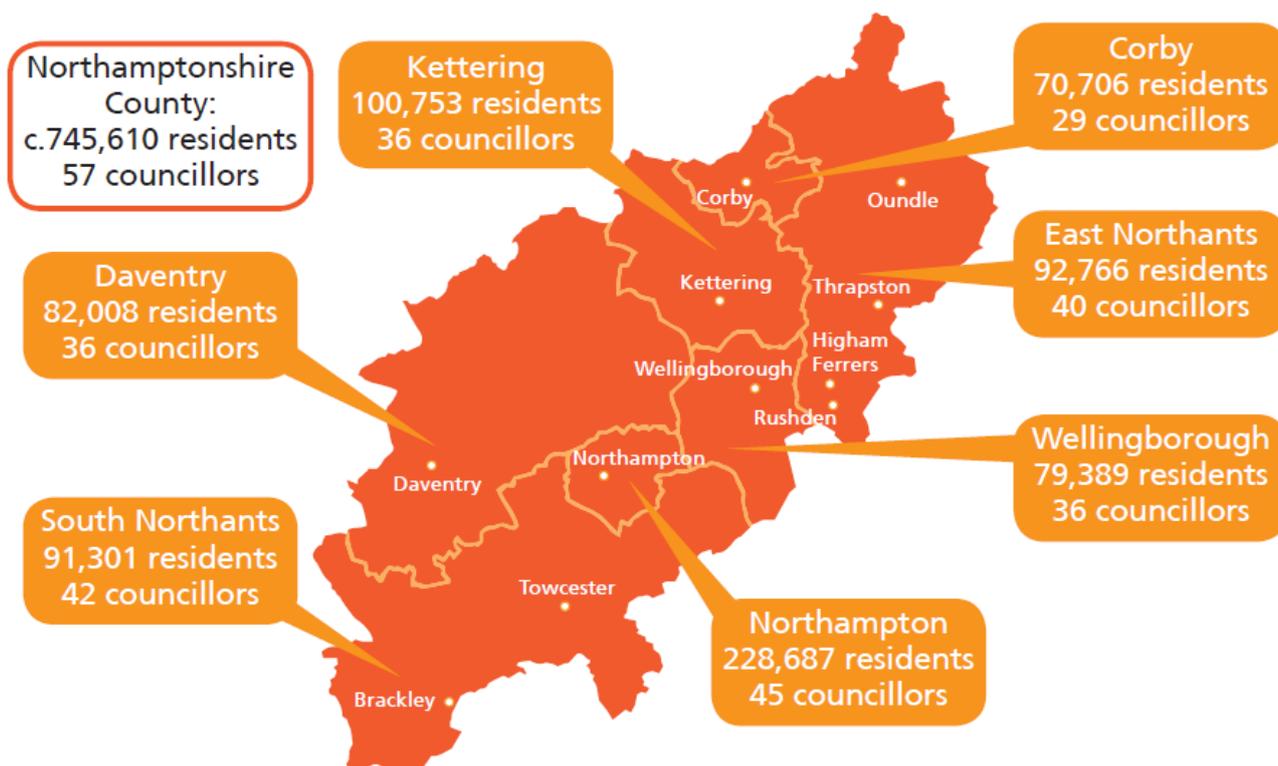
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1. Introduction

Background and context of the proposal to be assessed

- 1.1 Following an invitation from the Government, and because of the need to make local government services more sustainable, Northamptonshire's eight councils are consulting on a proposal to reduce the number of councils in the county from eight to two from April 2020, in order to understand levels of support and any potential impacts.
- 1.2 In addition to the many parish and town councils, there are currently eight local authorities providing council services across Northamptonshire in what is often called a 'two-tier' structure – in which major services are divided between the county council (on the one hand) and the seven borough or district councils (on the other).
- » Northamptonshire County Council provides services for residents across the whole of the county, including education, social care for children and adults, highways, and some environmental services.
 - » Corby Borough Council, Daventry District Council, East Northamptonshire Council, Kettering Borough Council, Northampton Borough Council, South Northamptonshire Council and the Borough Council of Wellingborough provide important local services for residents in their areas, including housing, planning, waste collection, revenues and benefits, and leisure services.
- 1.3 The geography and population of the current borough councils is illustrated in Figure 1:

Figure 1: Current Borough Councils in Northamptonshire – Estimates of Population 2018 (Source: SNPP 2016)



- 1.4 Each of the eight councils has a political Leader and Chief Executive/Managing Director, and there is a total of 321 councillor positions running local government across Northamptonshire. Council tax levels are set separately by all the individual councils each year.
- 1.5 A recent Northamptonshire County Council Best Value Inspection report (January-March 2018), commissioned by the Government, found that the County Council did not have the right culture, governance and processes to make robust decisions, and subsequently has over-spent on its budget in previous years and faces significant on-going budget deficits.
- 1.6 In light of these problems, the Government has written to all eight Northamptonshire councils inviting them urgently to co-operate to make proposals – by the end of August 2018 – to restructure local government in the county.
- 1.7 Following the Government’s invitation and in the light of its criteria, the eight Northamptonshire councils are jointly considering a proposal where the current two-tier system of eight councils would be replaced by two unitary councils which would have responsibility for all council services in their respective areas. This option for two unitary authorities covering West Northants and North Northants would deliver two credible geographic units, both with populations in excess of 300,000.
- 1.8 The two new unitary councils would be:
- » WEST NORTHANTS UNITARY COUNCIL - Comprising the areas covered currently by Daventry, Northampton and South Northamptonshire councils
 - » NORTH NORTHANTS UNITARY COUNCIL - Comprising the areas covered currently by East Northamptonshire, Corby, Kettering and Wellingborough councils
- 1.9 The geography and population of the proposed new unitary councils is laid out in Figure 2:

Figure 2: Proposed Unitary Council Areas and Population (Source: SNPP 2018)



Equalities Act 2010

- ^{1.10} Any decision to reorganise local government structures on the basis outlined above would need to take account of the Public Sector Equality Duty, as set out by Equalities Act 2010. Guidance on these aims can be found in the Equality and Human Rights Commission’s (EHRC) Public Sector Equality Duty Technical Guidance¹.
- ^{1.11} Section 149 of the Act imposes a duty on 'public authorities' and other bodies when exercising public functions to have due regard to the need to:
- » Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act.
 - » Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - » Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- ^{1.12} The term “relevant protected characteristic” specifically pertains to nine characteristics as set out by the Act:
- » age
 - » disability
 - » gender reassignment
 - » marriage and civil partnership
 - » pregnancy and maternity
 - » race
 - » religion or belief
 - » sex
 - » sexual orientation.
- ^{1.13} This document is an Equalities impact Assessment (EqIA) and seeks to examine any potential impacts of the proposed local government reorganisation on each of these groups in turn, as well as certain other characteristics such as rurality and deprivation. EqIAs assist in understanding the implications of policies and decisions on people with protected characteristics, and an EqIA serves as evidence of the “due regard” required by the Equalities Act 2010.
- ^{1.14} Services provided by the county and district councils are unlikely to change immediately as a result of any restructuring. Furthermore, the design of any possible future councils has not yet been carried out, and therefore the potential impact of specific service changes cannot be assessed at this stage. This EqIA will therefore confine its scope to the particular impact of the potential change from a two-tier structure (with a county council and seven borough/district councils) to two unitary authorities, without regard to the future implementation of specific service provision.

¹ <https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>

2. Impacts

Examination of those affected by the proposal

- 2.1 This section examines the current distribution of each protected characteristic across Northamptonshire and considers any potential impacts that can be anticipated on these groups.

Age

- 2.2 There is of course a wide distribution of people of all ages throughout Northamptonshire. When examining the impact of the proposed council reorganisation on persons of various age groups, it is appropriate to focus on the most vulnerable, i.e. children and the elderly.
- 2.3 The number of individuals and percentage of total population for each of these groups is given in Figure 3 below, the source of which is the recently released 2017 Mid-Year Estimates:

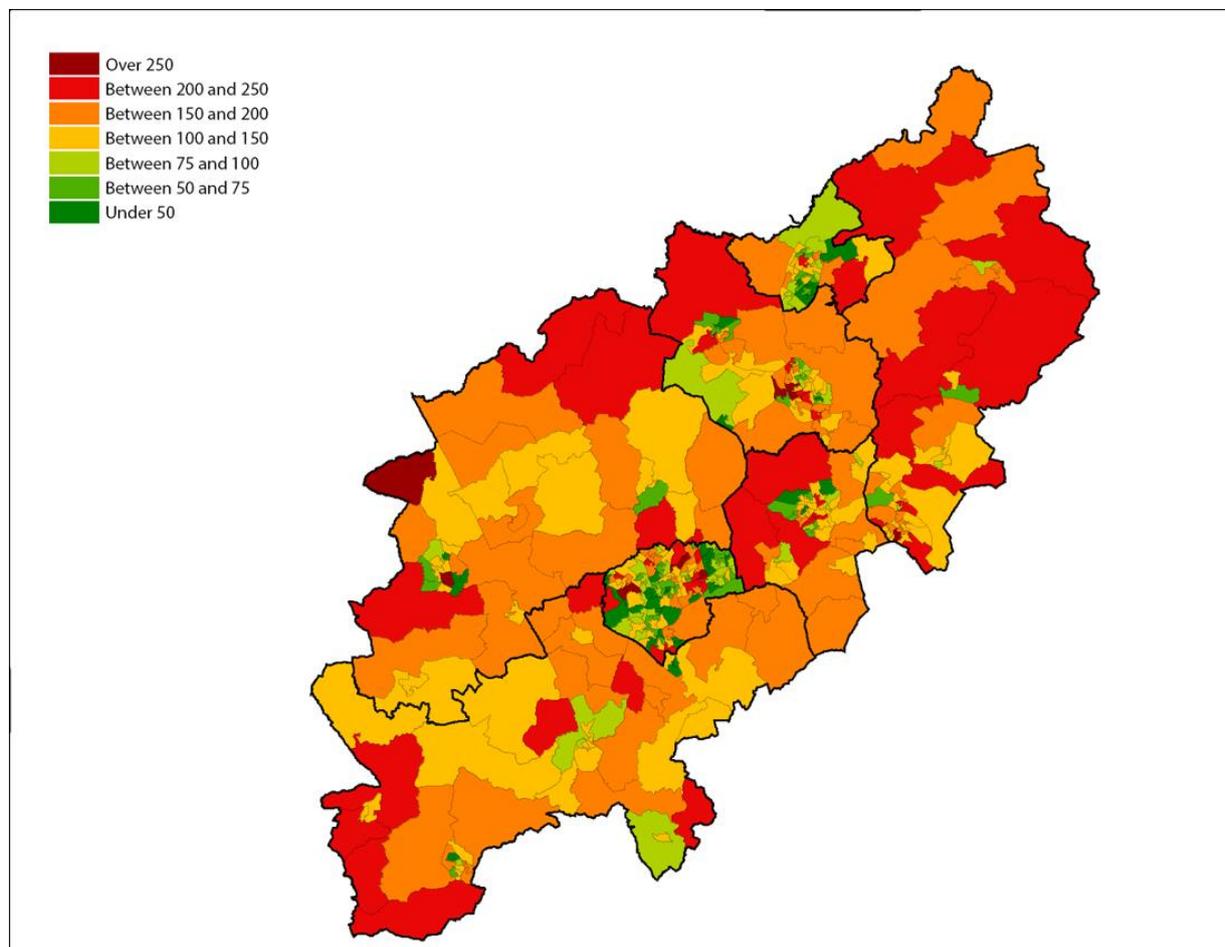
Figure 3: Population of residents under 16, 65+ and 75+ (Source: Mid-Year Estimates 2017)

Geography	Age Group						Total
	Under 16	% of total	Over 65	% of total	Over 75	% of total	
Corby	16,152	23%	9,169	13%	3,688	5%	69,540
East Northamptonshire	18,868	20%	17,888	19%	7,163	8%	93,135
Kettering	21,684	22%	17,391	17%	6,994	7%	100,252
Wellingborough	17,228	22%	14,072	18%	5,605	7%	78,914
Daventry	16,117	20%	15,869	19%	6,159	7%	82,638
Northampton	50,837	23%	31,677	14%	13,246	6%	225,656
South Northamptonshire	18,485	20%	17,484	19%	6,898	8%	91,074
Proposed	Under 16	% of total	Over 65	% of total	Over 75	% of total	Total
North Northants	73,932	22%	58,520	17%	23,450	7%	341,841
West Northants	85,439	21%	65,030	16%	26,303	7%	399,368
Total	159,371	21.5%	123,550	16.7%	49,753	6.7%	741,209

- 2.4 As can be seen from Figure 3, the largest proportions of the population over 75 years old are found in East and South Northamptonshire (8%). Conversely, the lowest proportions are found in Corby and Northampton (5% and 6% respectively). In parallel, these two districts also have the highest population of under 16s (23%). Under the proposed approach of creating two new unitary authorities, the proportions of each of the groups identified would become more equal, both councils having approximately the same proportions of each of the potentially vulnerable age groups identified.

- 2.5 The spatial distribution of the over 75 population according to the 2016 Mid-Year Estimates² is shown in Figure 4:

Figure 4: Spatial distribution of Over 75s in Northamptonshire (Source: Mid-Year Estimates 2016)



- 2.6 It can be seen from Figure 4 that the highest numbers of over 75s (at the time of the census) were to be found in areas near to the borders of Northamptonshire, with many of the group living in rural areas. As it is the case that the elderly are more likely to suffer difficulties with mobility, care should be taken to ensure that services on which they rely that require some assistance with travel, continue to be provided at accessible locations.
- 2.7 Service changes are a realistic possibility, but at this point in the process they are not defined, and it is not possible to predict these changes and their effects. The situation will continue to be monitored and amendments to the EIA will be made as appropriate to reflect developing understanding. However, one potential for impact is in relation to those who live in an area that might in future be close to the proposed border between the two unitary authorities. As previously noted, Northamptonshire County Council currently provides services for residents across the whole of the county, including education and social care for children and adults. If a resident who lives in one district utilises one of these services in another district (e.g. a Daventry resident who happens to attend an adult social care facility in Kettering), both are currently within the remit of Northamptonshire County Council. However, it may be the case in future that a resident of the proposed West Northants will require use of a service in North Northants, which may no longer have a duty to provide the service to residents of West Northants (and vice versa). Even if there is a reciprocal

² Outputs from the 2017 Mid-Year Estimates at the small area level illustrated in this map are not yet available.

arrangement to provide services to residents of the other unitary authority, it is possible that some aspects of that service e.g. funding of travel etc. may be impacted by the proposal, and any impact to funding will disproportionately affect the most deprived residents. Given that children access education and social care, and the elderly are more likely to access adult social care than many other groups, this represents a potential impact on the protected characteristic of age.

- 2.8 To mitigate this potential effect, the unitary councils should be mindful of maintaining continuity of service provision to residents near the proposed border; and ensure adequate transition arrangements are put in place to ensure that those affected can continue to access services.

Disability

- 2.9 Approximately 16% of residents of Northamptonshire suffer from a long-term illness or disability that affects their day to day activities to some degree. The percentage of total population with these issues for each of the current districts is given in Figure 5 below, based on the most recent reliable data available, the 2011 census:

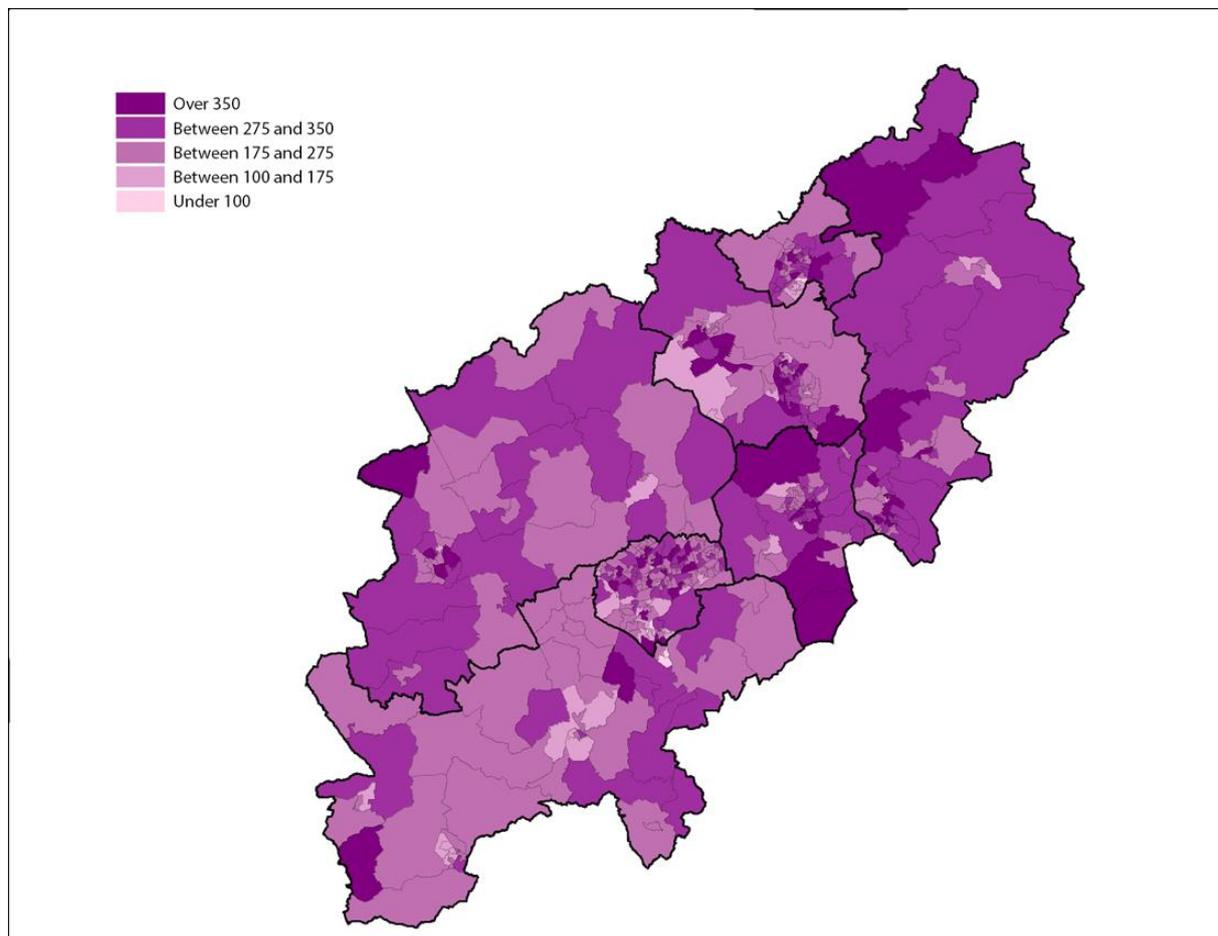
Figure 5: Percentage of residents suffering from a long-term illness or disability that limits day to day activities
(Source: Census 2011)

Geography	Day to Day Activities limited by disability or long-term illness		
	Limited a lot	Limited at least a little	Not limited
Current			
Corby	8.9%	17.7%	82.3%
East Northamptonshire	6.9%	16.2%	83.8%
Kettering	7.7%	17.1%	82.9%
Wellingborough	7.9%	17.9%	82.1%
Daventry	6.6%	15.6%	84.4%
Northampton	7.2%	15.8%	84.2%
South Northamptonshire	5.8%	13.9%	86.1%
Proposed			
North Northants	7.8%	17.2%	82.8%
West Northants	6.7%	15.3%	84.7%
Total	7.2%	16.2%	83.8%

- 2.10 As can be seen from Figure 5, South Northamptonshire has the smallest proportion of residents with very limiting long-term illness or disability, and conversely Corby has the highest. Under the proposed council reorganisation, the proportions would become more equal, although it should be noted that North Northants will have a slightly higher proportion of disabled or long term ill residents than West Northants.

2.11 The census measured spacial distribution of the disabled population is shown in Figure 6:

Figure 6: Spatial distribution of the disabled population in Northamptonshire (Source: Census 2011)



- 2.12 It can be seen from Figure 6 that there is no clear pattern to the distribution of disabled persons (at the time of the census), although it should be noted that areas in the proposed North Northants unitary authority (specifically East Northamptonshire and Wellingborough) contain more areas with somewhat higher instances of disability than other districts. Given that many disabled people are more likely to suffer difficulties with mobility, care should be taken to ensure that services on which they rely that require assistance with travel, continue to be provided at accessible locations.
- 2.13 Service changes are a realistic possibility, but at this point in the process they are not defined, and it is not possible to predict these changes and their effects. The situation will continue to be monitored and amendments to the EIA will be made as appropriate to reflect developing understanding. However, one potential for impact is in related to those who live in an area that might in future be close to the proposed border between the two unitary authorities. As previously noted, Northamptonshire County Council currently provides services for residents across the whole of the county, including education and social care for children and adults. If a disabled resident who lives in one district utilises one of these services in another district (e.g. a Daventry resident who happens to attend an adult social care facility in Kettering), both are currently within the remit of Northamptonshire County Council. However, it may be the case in future that a resident of the proposed West Northants will require use of a service in North Northants, which may no longer have a duty to provide the service to residents of West Northants (and vice versa). Even if there is a reciprocal arrangement to provide services to residents of the other unitary authority, it is possible that some aspects of that service e.g. funding of travel etc. may be impacted by the proposal, and any impact to funding

will disproportionately affect the most deprived residents. Given that the disabled are potentially more likely to require access to social care, this represents a potential impact on the protected characteristic of disability.

- 2.14 To mitigate this potential effect, the unitary councils should be mindful of maintaining continuity of service provision to residents near the proposed border; and ensure adequate transition arrangements are put in place to ensure that those affected can continue to access services.

Gender reassignment

- 2.15 No data is currently available on instances of gender reassignment in Northamptonshire. Nonetheless, there is no reason to anticipate any impact of the council reorganisation on residents with this protected characteristic.

Marriage and Civil Partnership

- 2.16 At the time of the Census 2011, there were 321,915 married people living in Northamptonshire, along with 613 people in a same sex civil partnership. Collectively, this represented 43.5% of the total population, distributed fairly uniformly across the county. There is currently no reason to anticipate any impact of the council reorganisation on residents with this protected characteristic.

Pregnancy and Maternity

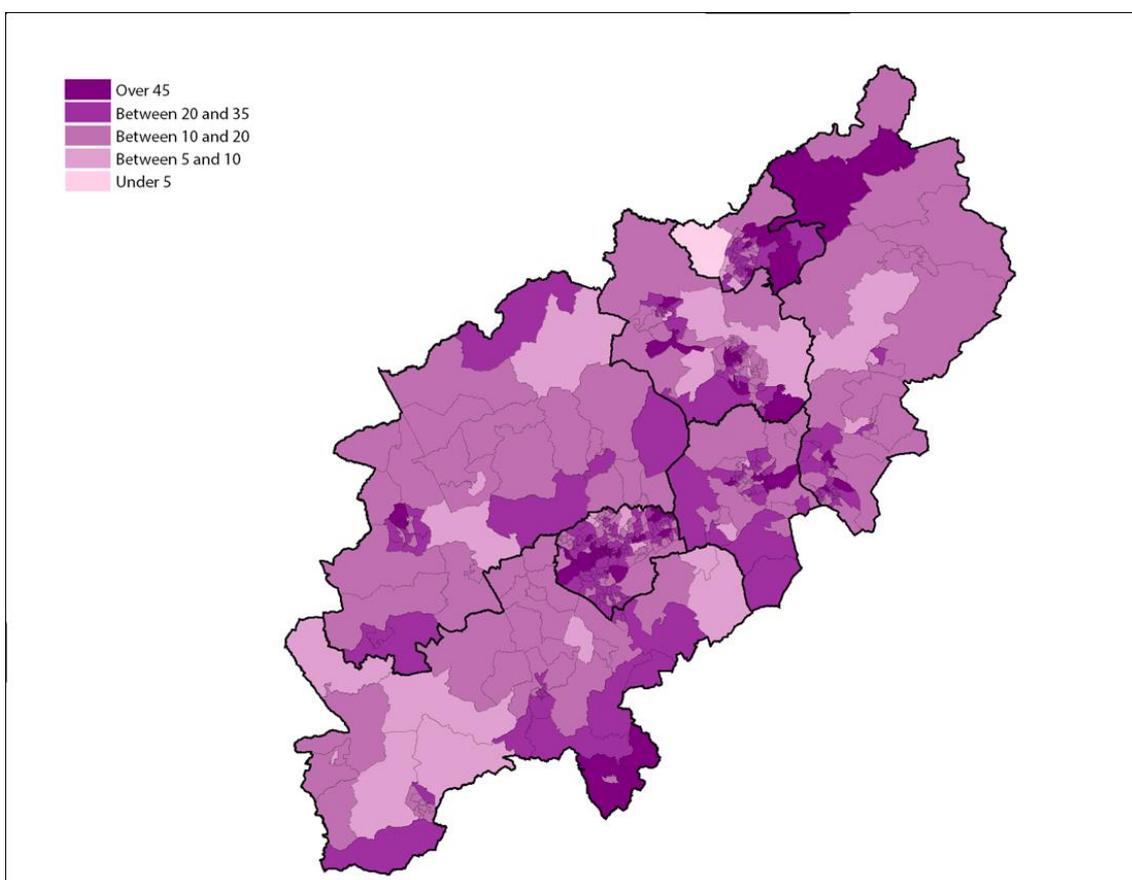
- 2.17 The number of pregnancies at any given time in Northamptonshire is difficult to enumerate, and there is no official data source that serves that purpose. However, a reasonable proxy can be established by examination of the number of residents under one year in age, since each necessarily corresponds to a recent pregnancy.
- 2.18 The number of individuals and percentage of total population aged under one year is given in Figure 7 below, the source of which is the recently released 2017 Mid-Year Estimates:

Figure 7: Numbers & proportions of infant residents under one year old in Northamptonshire (Source: Mid-Year Estimates 2017)

Geography	Persons under one year old	
	Number	Percentage of Total Population
Current		
Corby	995	1.4%
East Northamptonshire	998	1.1%
Kettering	1,195	1.2%
Wellingborough	918	1.2%
Daventry	818	1.0%
Northampton	3,217	1.4%
South Northamptonshire	840	0.9%
Proposed		
North Northants	4,106	1.2%
West Northants	4,875	1.2%
Total	8,981	1.2%

- 2.19 As can be seen from Figure 7, the largest proportions of the population under one year old (and residents who are pregnant or providing maternity care) are found in Corby and Northampton (1.4%). In terms of absolute numbers, the majority of infants reside in Northampton, with a significant number also in Kettering. Conversely, the lowest proportions and absolute numbers are found in Daventry and South Northamptonshire (1% and 0.9% respectively). Under the proposed council reorganisation, the proportions of each of the groups identified would become more equal; both proposed unitary councils having approximately the same proportion (1.2%) of residents aged under a year (and therefore residents who are pregnant or providing maternity care).
- 2.20 The spacial distribution of the infant population according to the 2016 Mid-Year Estimates³ is shown in Figure 8:

Figure 8: Spacial distribution of persons aged under one year in Northamptonshire (Source: Mid-Year Estimates 2016)



- 2.21 It can be seen from Figure 8 that there is no clear pattern to the distribution of infant residents, although it should be noted that there are somewhat higher levels in more urban areas, likely due to the higher population density. As it is the case that pregnant mothers and parents or guardians with very young children are more likely to suffer difficulties with mobility (particularly if using public transport), care should be taken to ensure that services on which they rely that require travel, continue to be provided at accessible locations.
- 2.22 Service changes are a realistic possibility, but at this point in the process they are not defined, and it is not possible to predict these changes and their effects. The situation will continue to be monitored and amendments to the EIA will be made as appropriate to reflect developing understanding. The only potential for impact is in cross border services. As previously noted, Northamptonshire County Council currently

³ Outputs from the 2017 Mid-Year Estimates at the small area level illustrated in this map are not yet available.

provides services for residents across the whole of the county, including education and social care for children and adults and children’s centres. If an infant, parent or guardian of an infant, or a pregnant mother who lives in one district utilises one of these services in another district (e.g. a pregnant Daventry resident accessing adult social care in Kettering), both are currently within the remit of Northamptonshire County Council). However, it may be the case that a resident of the proposed West Northants will require use of a service in North Northants, which may no longer have a duty to provide the service to residents of West Northants (and vice versa). Even if there is a reciprocal arrangement to provide services to residents of the other unitary authority, it is possible that some aspects of that service e.g. funding of travel etc. may be impacted by the proposal, and any impact to funding will disproportionately affect the most deprived residents. Given that adult social care includes residents who may be pregnant or have recently given birth, and child social care extends to the very young infants, this represents a potential impact on the protected characteristic of pregnancy and maternity.

- 2.23 To mitigate this potential effect, the unitary councils should be mindful of maintaining continuity of service provision to residents near the proposed border; and ensure adequate transition arrangements are put in place to ensure that those affected can continue to access services.

Race

- 2.24 The census captures country of birth, national identity and ethnicity. It is most common to consider ethnicity, and census data divides ethnicity into five distinct sub categories: White, Mixed, Asian, Black and Other. The percentage of total population of each district for each of these groups is given in Figure 9 below, based on the 2011 Census:

Figure 9: Relative proportion of ethnic population in each Northamptonshire district (Source: 2011 Census)

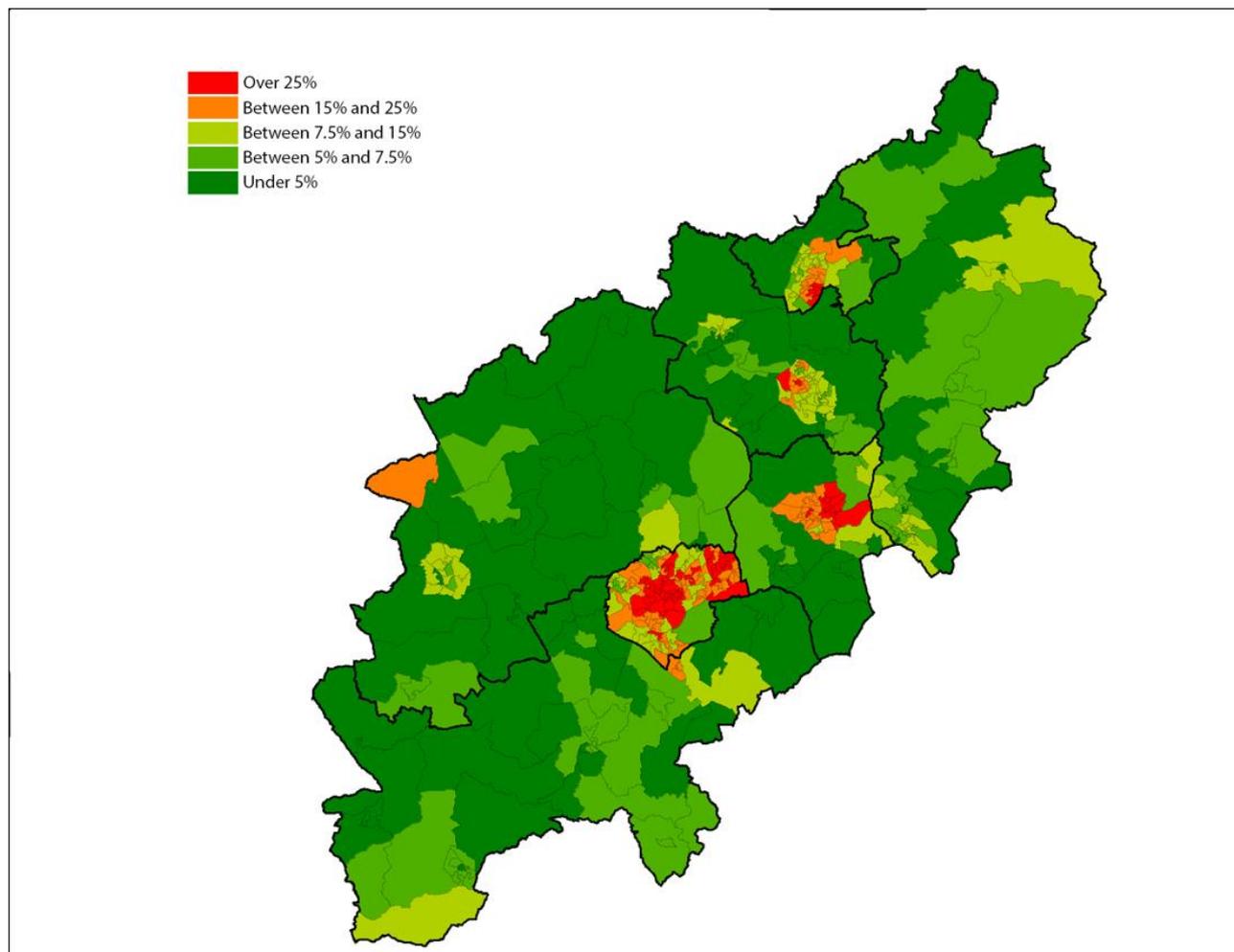
Geography	Ethnic Group				
	White	Mixed/multiple ethnic group	Asian/Asian British	Black/African/Caribbean/Black British	Other ethnic group
Corby	95.5%	1.4%	1.3%	1.7%	0.2%
East Northamptonshire	96.7%	1.2%	1.2%	0.7%	0.2%
Kettering	93.9%	1.4%	3.2%	1.1%	0.4%
Wellingborough	87.4%	2.8%	5.9%	3.5%	0.3%
Daventry	97.0%	1.1%	1.4%	0.4%	0.1%
Northampton	84.6%	3.2%	6.4%	5.0%	0.7%
South Northamptonshire	96.9%	1.2%	1.3%	0.4%	0.1%
Proposed					
North Northants	93.4%	1.7%	2.9%	1.7%	0.3%
West Northants	90.0%	2.3%	4.2%	3.0%	0.4%
Total	91.6%	2.0%	3.6%	2.4%	0.4%

- 2.25 As can be seen from Figure 9, the largest proportions of the population belonging to an ethnic group other than White are found in Wellingborough and Northampton (12.6% and 15.4% respectively). Conversely, the

lowest proportions are found in Daventry and South Northampton (3% and 3.1% respectively). Under the proposed council reorganisation, the proportions of each of the groups identified would become more equal, however West Northants would have a slightly higher proportion of non-white residents, primarily due to the high concentrations of this group found in Northampton.

- 2.26 The census measured spacial distribution of residents that identified as ethnicities other than White British at the time of the census 2011 is shown in Figure 10:

Figure 10: Percentages of residents that identify as other than White British in Northamptonshire (Source: Census 2011)



- 2.27 It can be seen from Figure 10 that the highest percentages of non-white British (at the time of the census) were to be found in more urban areas such as Northampton, Kettering, Corby and Wellingborough. There is currently no reason to believe that residents that identify as any particular ethnicity are likely to be unduly impacted by the proposed council reorganisation.

Religion or Belief

- 2.28 The census records the religious beliefs of the population (it is worth noting that the census question does not ask about whether the religion is *being practiced*). It is a question that has a higher proportion of non-response - in the 2011 census, 6.7% of Northamptonshire residents left the question blank. Nevertheless, analysis can be made of the remaining 93.7% of respondents. The percentage of the population of each district for each religious group is given in Figure 11 overleaf, based on respondents to the question in the 2011 Census:

Figure 11: Proportion of religious belief in each Northamptonshire district, excluding non-respondents (Source: 2011 Census)

Geography	Religion							
	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion
Current								
Corby	62.8%	0.2%	0.3%	0.1%	0.7%	0.2%	0.3%	35.4%
East Northamptonshire	65.8%	0.2%	0.3%	0.1%	0.3%	0.1%	0.4%	32.6%
Kettering	63.3%	0.3%	0.9%	0.1%	0.8%	1.1%	0.5%	33.0%
Wellingborough	61.8%	0.3%	3.9%	0.1%	1.8%	0.2%	0.6%	31.3%
Daventry	69.4%	0.4%	0.4%	0.1%	0.6%	0.2%	0.4%	28.5%
Northampton	60.6%	0.5%	1.7%	0.1%	4.5%	0.5%	0.5%	31.5%
South Northamptonshire	70.8%	0.2%	0.5%	0.1%	0.4%	0.2%	0.3%	27.5%
Proposed								
North Northants	63.6%	0.3%	1.3%	0.1%	0.9%	0.5%	0.4%	33.0%
West Northants	64.7%	0.4%	1.2%	0.1%	2.7%	0.4%	0.4%	30.0%
Total	64.2%	0.3%	1.2%	0.1%	1.9%	0.4%	0.4%	31.4%

^{2.29} As can be seen from Figure 11, the largest proportions of the population belong to the Christian religion. The highest proportion identified is South Northamptonshire (70.8%), which also has the lowest levels of non-religion (27.5%) of the districts. Relatively large proportions of non-Christians can be found in Wellingborough (6.8%) and Northampton (7.8%). Wellingborough has a relatively large proportion of Hindus (3.9%), and Northampton a proportionally large Muslim population (4.5%), along with relatively high Hindu population (1.7%) compared to other districts. There is currently no reason to believe that residents of any given religious faith are likely to be unduly impacted by the proposed council reorganisation.

Sex

^{2.30} According to the 2017 Mid-Year Estimates, the gender composition of Northamptonshire was approximately 49.4% male, 50.6% female. Each district exhibits the same proportions to within 0.5%, and this will be maintained in the proposed unitary authorities. Given the uniformity of this distribution and the gender neutral nature of the proposal, there is no reason to anticipate any impact of the proposed council reorganisation on residents with this protected characteristic.

Sexual Orientation

^{2.31} No data is currently available on sexual orientation of residents of Northamptonshire. Nonetheless, there is no reason to anticipate any impact of the proposed council reorganisation on residents with this protected characteristic.

Council Staff

- 2.32 If the proposal for a two-unitary structure is accepted, then savings would be made by reducing the number of senior staff. For example, instead of the current eight senior management teams there would be two. Similarly, the increasing demands of a growing and ageing population, balanced by increasing digitisation and transformation of services, may require changes to the workforce over time. In terms of specific protected characteristics; reductions in senior staffing will likely disproportionately impact older staff. Alternative employment within the council should be offered where possible.

Rurality

- 2.33 The census defines each of its output areas as either Urban or Rural. Output areas are treated as urban if they were allocated to a built-up area with a population of 10,000 or more people in 2011, otherwise they are classed as Rural. Consequently, the rurality or otherwise of the population of a given district can be enumerated as shown below in Figure 12 for the current districts of Northamptonshire and the proposed council areas:

Figure 12: Proportion of Population living in Urban and Rural Areas in each Northamptonshire District (Source: 2011 Census)

Geography	Urban	Rural
Corby	92.8%	7.2%
East Northamptonshire	42.8%	57.2%
Kettering	79.5%	20.5%
Wellingborough	67.3%	32.7%
Daventry	36.9%	63.1%
Northampton	99.5%	0.5%
South Northamptonshire	15.6%	84.4%
North Northants	69.2%	30.8%
West Northants	67.4%	32.6%
Total	68.2%	31.8%

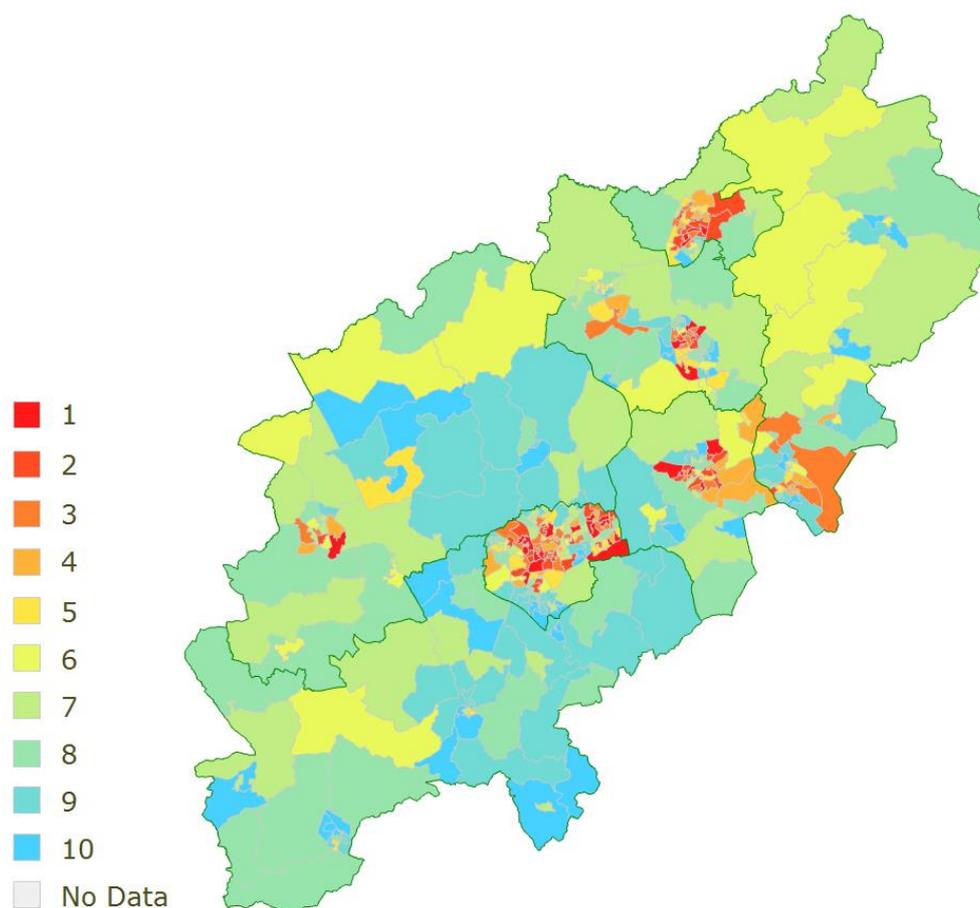
- 2.34 As can be seen from Figure 12, the districts with the largest proportions of residents living in areas classed as urban are within the Northampton (99.5%) and Corby (92.8%), whilst the most rural districts are South Northamptonshire and Daventry. Assuming access to services does not change, there is currently no reason to believe that residents of any level of rurality are likely to be unduly impacted by the proposed council reorganisation.
- 2.35 However, as previously noted, Northamptonshire County Council currently provides services for residents across the whole of the county, including education and social care for children and adults. If a rurally isolated resident who lives in one district utilises one of these services in another district (e.g. a Daventry resident who happens to attend an adult social care facility in Kettering), both are currently within the remit of Northamptonshire County Council. However, it may be the case in future that a resident of the proposed West Northants will require use of a service in North Northants, which may no longer have a duty to provide the service to residents of West Northants (and vice versa).
- 2.36 Even if there is a reciprocal arrangement to provide services to residents of the other unitary authority, it is possible that some aspects of that service e.g. funding of travel etc. may be impacted by the proposal, and

any impact to funding may disproportionately affect the most rural residents since they are more likely to be impacted by any changes affecting travel and access, relative to residents living in more urban areas.

Deprivation

- ^{2.37} The Index of Multiple Deprivation (IMD) is the main statistical overview of relative deprivation covering the whole of England. It is based on small geographical areas called Lower Super Output Areas (LSOAs), of which there are 32844 across the country, with 422 of them falling within Northamptonshire. Each LSOA represents around 1,600 people. The IMD is released on an ad-hoc timescale by the Ministry of Housing Communities & Local Government (MHCLG). The 2015 data release is analysed here.
- ^{2.38} The distribution of deprivation in Northamptonshire is shown in Figure 13⁴. The scale shows rankings of each LSOA by decile, i.e. 1 (red) = amongst the 10% most deprived LSOAs in England, whereas blue (10) = amongst the 10% least deprived LSOAs in England. Between these extremes, there is a graduated scale covering each national decile:

Figure 13: Spatial distribution of the deprivation in Northamptonshire by decile (Source: IMD 2015, Northamptonshire Council)



- ^{2.39} It can be seen from Figure 6 that deprivation is focussed around urban areas, particularly Northampton, Wellingborough, Kettering and Corby. It should be noted that areas in the proposed North Northants unitary authority contain more areas with somewhat higher instances of deprivation than other districts (in the proposed West Northants unitary authority, only urban Northampton and Daventry contain LSOAs in the top 30% of deprivation). Given that many people living in deprived areas are more likely to depend on council

⁴ Source: <https://www.northamptonshireanalysis.co.uk/dataviews/view?viewId=361>

services, care should be taken to ensure that services on which they rely continue to be provided at accessible locations.

- 2.40 The Index of Multiple Deprivation is subdivided into several categories, and districts are ranked across England in each category. At the time of publication, there were 326 local authority districts in England, therefore a rank of 1 represents the most deprived district, whereas 326 the least. These subdivisions by district (presented from most to least deprived), along with the indicative average scores for each proposed unitary authority are contained in Figure 14 below:

Figure 14: District Level Index of Deprivation by National Rank (Source: DCLG 2015)

District	Income	Employment	Education Skills and Training	Health Deprivation and Disability	Crime	Barriers to Housing and Services	Living Environment	Overall Index of Multiple Deprivation
Corby	73	60	19	48	85	172	285	75
Northampton	128	144	66	100	63	43	162	108
Wellingborough	124	113	67	147	99	117	236	133
Kettering	152	148	124	133	120	276	205	168
East Northamptonshire	219	208	142	215	193	204	225	221
Daventry	258	257	204	252	199	85	204	238
South Northamptonshire	323	323	293	317	306	114	241	317
Average for North Northants	142	132	88	136	124	192	238	149
Average for West Northants	236	241	188	223	189	81	202	221
Average of Northamptonshire Districts	182	179	131	173	152	144	223	180

- 2.41 Notably, there is an overall correlation between the order of the overall index ranks, and most of the sub-categories (with the exceptions of “barriers to housing and services” and “living environment”). In each of these sub-categories, Corby exhibits the highest rank of deprivation and South Northamptonshire the lowest. However, in “barriers to housing and services”, “crime” and “living environment”, Northampton exhibits the highest rank. Corby has the highest rank on the overall index (and four of the seven sub-categories), with Northampton second. With an overall rank of 317 (out of a maximum of 326), South Northamptonshire is the least deprived district by an appreciable margin.

- 2.42 Income is a particular area for attention. Corby, Northampton and Wellingborough have levels of income-based deprivation in the top 40% of all districts nationally. One effect of the proposed unitary authority system would be revision to council tax banding. While local authorities do not all charge the same council tax as each other, all areas *within* a single local authority are required by law to pay the same council tax for

each band. Whereas currently the seven borough/district areas have different council tax rates, the charges would be standardised within each of the two proposed new unitary council areas. This will likely mean that for some households, the level of council tax will be higher than under the existing arrangements, and this would adversely impact those on low incomes. Whilst actual changes to council tax are unknown, it is conceivable that households in areas that currently have the lowest levels of council tax will experience larger increases. East Northamptonshire and Wellingborough in the proposed North Northants unitary council and Daventry in the West Northants council currently have the lowest council tax levels, and each has some areas with relatively higher levels of deprivation – therefore residents living in the most deprived areas of Daventry, Wellingborough and East Northamptonshire are most likely to be disproportionately affected by any council tax increases.

- 2.43 Other than income-based impacts, and assuming that service provision does not change, there is no reason to anticipate a meaningful impact on those affected by deprivation as a whole. However, one potential for impact is in related to those who live in an area that might in future be close to the proposed border between the two unitary authorities. As previously noted, Northamptonshire County Council currently provides services for residents across the whole of the county, including education and social care for children and adults. If a disadvantaged resident who lives in one district utilises one of these services in another district (e.g. a Daventry resident who happens to attend an adult social care facility in Kettering), both are currently within the remit of Northamptonshire County Council. However, it may be the case in future that a resident of the proposed West Northants will require use of a service in North Northants, which may no longer have a duty to provide the service to residents of West Northants (and vice versa). Even if there is a reciprocal arrangement to provide services to residents of the other unitary authority, it is possible that some aspects of that service e.g. funding of travel etc. may be impacted by the proposal, and any impact to funding will disproportionately affect the most deprived residents.
- 2.44 To mitigate this potential effect, the unitary councils should be mindful of maintaining continuity of service provision to residents near the proposed border; and ensure adequate transition arrangements are put in place to ensure that those affected can continue to access services.

Representation

- 2.45 Currently, as was illustrated in Figure 1, the districts of Northamptonshire are represented by a total of 264 district councillors and 57 county councillors. Under the proposed system these districts will be dissolved, and councillors will be established for each new unitary authority. The number of councillors that will be established in each is not known, pending a review by the Boundary Commission for England, however it is considered likely that there will be an equal number of councillors in each Electoral (county) Ward. As such, it is possible to estimate the change in public representation that will emerge.
- 2.46 It should be noted that in this discussion, only the effect of the proposed changes is analysed. Therefore, the effective population covered by the current district councillors (excluding county councillors) is compared to the effective population covered by only the *increase* in the number of unitary authority councillors under the proposed system; in both cases the existence of one county councillor per electoral county ward remains unchanged.
- 2.47 For perfectly equal representation, each councillor would in theory represent the same number of people. However, due to variations in the size of the population in each ward, this idealised situation cannot happen in practice. Under the current system, variations of both the ward populations and the number of district councillors per ward result in unequal representation. Under the proposed system, only variations in the

population of each ward would yield deviation from equality, assuming district councillors are replaced with a uniform increase in the number of councillors at electoral county ward level. The last two columns of Figure 15 below show the percentage deviation from “ideal” equal representation under each system.

Figure 15: Changes in Comparative Levels of Representation Across Northamptonshire under Current and Proposed Councils
(Source: ORS)

Geography	Average population per Ward	Current District Councillors per Ward	Current Average Population per District Councillor	Deviation from Equal Representation across county	
				Current District Councillor System	Proposed Equal Councillors per Ward system
Corby	5,892	2.4	2,438	12.7%	-13.0%
East Northamptonshire	4,217	1.8	2,319	17.0%	19.1%
Kettering	5,927	2.1	2,799	-0.2%	-13.7%
Wellingborough	4,962	2.3	2,205	21.0%	4.8%
Daventry	5,126	2.4	2,103	24.7%	1.7%
Northampton	6,930	1.4	5,082	-82.0%	-32.9%
South Northamptonshire	3,382	1.6	2,174	22.2%	35.1%
North Northants	5,129	2.1	2,437	12.7%	1.6%
West Northants	5,333	1.5	3,678	-31.7%	-2.3%
Total	5,214	1.9	2,793	0.0%	0.0%

2.48 Under the current system, citizens of Wellingborough, Daventry and South Northamptonshire benefit from significantly higher levels of representation than other districts (21%, 24.7% and 22.2% above average respectively), whereas those living in Northampton are under-represented relative to the Northamptonshire average (-82%). Under the proposed system, residents in Corby, Daventry and Wellingborough would experience a decrease in their existing level of representation, whilst residents of South Northamptonshire would experience a meaningful 12.9% increase in their degree of representation relative to the average. Northampton residents’ representation would increase by 41.1% versus the average under the proposed arrangements, remaining underrepresented (-32.9%), but to a lesser extent. Corby and Kettering would become slightly under-represented due to their average population per ward being relatively high.

2.49 It is hard to assess the extent of the impact on individuals, but it may be harder for residents in some areas to raise issues with their local councillors and influence service delivery; however, it seems that the proposed system would likely yield a greater level of equality across Northamptonshire compared to current arrangements.

3. Conclusions

Summary of identified Impacts

3.1 The impacts identified in this document are summarised below in Figure 16:

Figure 16: Summary Table of Identified Impacts

Protected Characteristic	Potential Impact of Change to two unitary councils	Recommended Mitigation
Age	<p>Current residents of one proposed unitary authority that access services at a location that will be within the remit of the other unitary authority, may be impacted by the proposal.</p> <p>One unitary authority may not be under any obligation to provide services to a resident outside the authority. Additionally, arrangements or funding of travel to locations outside the authority may be affected. Thus a resident may have to access the service at a different location inside their own unitary authority, which may be further away.</p> <p>This will primarily impact those living near the proposed border between North and West Northants; and is of particular concern in cases where the resident has difficulty with mobility/travel. This impact is likely to be more prevalent amongst older age groups.</p>	<p>Dialogue between any new unitary authorities should be maintained after any reorganisation to ensure appropriate transition arrangements in service provision and access to services for those affected, before appropriate alternative arrangements are established.</p>
Disability	<p>Current residents of one proposed unitary authority that access services at a location that will be within the remit of the other unitary authority, may be impacted by the proposal.</p> <p>One unitary authority may not be under any obligation to provide services to a resident outside the authority. Additionally, arrangements or funding of travel to locations outside the authority may be affected. Thus a resident may have to access the service at a different location inside their own unitary authority, which may be further away.</p> <p>This will primarily impact those living near the proposed border between North and West Northants; and is of particular concern in cases where the resident has difficulty with mobility/travel. The impact is likely to be greater for disabled people than some other protected groups, especially if such travel involves public transport.</p>	<p>Dialogue between any new unitary authorities should be maintained after any reorganisation to ensure appropriate transition arrangements in service provision and access to services for those affected, before appropriate alternative arrangements are established.</p>
Gender Reassignment	No data on characteristic. No impact anticipated.	None
Marriage and civil partnership	No impact anticipated.	None
Pregnancy and maternity	<p>Current residents of one proposed unitary authority that access services at a location that will be within the remit of the other unitary authority, may be impacted by the proposal.</p> <p>One unitary authority may not be under any obligation to provide services to a resident outside the authority. Additionally, arrangements or funding of travel to locations outside the authority may be affected. Thus a resident may have to access the service at a different location inside their own unitary authority, which may be further away.</p>	<p>Dialogue between any new unitary authorities should be maintained after any reorganisation to ensure appropriate transition arrangements in service provision and access to services for those affected, before appropriate alternative arrangements are established.</p>

	This will primarily impact those living near the proposed border between North and West Northants; and is of particular concern in cases where the resident has difficulty with mobility/travel. This difficulty is more common in the pregnant mothers and parents of very small children than some other protected groups, especially if such travel involves public transport.	
Race	No impact anticipated.	None
Religion or belief	No impact anticipated.	None
Sex	No impact anticipated.	None
Sexual orientation	No data on characteristic. No impact anticipated.	None
Other: Characteristics not covered by the Equality Act		
Council Staff	Reorganisation of the councils may result in certain roles becoming surplus to requirement, potentially leading to redundancies. Reduction in senior staff may disproportionately impact older employees.	Where possible, alternative roles should be offered to employees affected by the proposed change.
Rurality	<p>Current residents of one proposed unitary authority that access services at a location that will be within the remit of the other unitary authority, may be impacted by the proposal.</p> <p>One unitary authority may not be under any obligation to provide services to a resident outside the authority. Additionally, arrangements or funding of travel to locations outside the authority may be affected. Thus a resident may have to access the service at a different location inside their own unitary authority, which may be further away.</p> <p>This will primarily impact those living near the proposed border between North and West Northants; and is of particular concern in cases where the resident is living in a relatively isolated location. This difficulty is more common for those living in rural locations, especially if such travel involves public transport.</p>	Dialogue between any new unitary authorities should be maintained after any reorganisation to ensure appropriate transition arrangements in service provision and access to services for those affected, before appropriate alternative arrangements are established.
Deprivation	Low income households are likely to be impacted by increases in Council Tax, in particular those that may experience higher increases, notably in the most deprived areas of Daventry, Wellingborough and East Northamptonshire	Ensure appropriate support for those on low incomes in the most deprived areas.
Resident Representation	Under the proposed system, residents in Corby, Daventry and Wellingborough would experience a decrease in their existing level of representation, whilst residents of Northampton and South Northamptonshire would experience an increase, relative to the average. Overall, citizen representation is likely to become more equal in each of the proposed unitary authority areas.	It may be harder for residents in some areas to raise issues with their local councillors and influence service delivery

- 3.2 On balance, there are very few immediate impacts of the proposed council reorganisation on those with protected characteristics under the Equalities Act 2010. The impacts identified here affect relatively few residents; but mitigations will need to be considered. This document and its findings remain under review, and if and when the design of any new councils is undertaken, a further Equalities Impact Assessment may be required.

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