

Cumulative Impact Assessment including 2024 to 2025 and 2025 to 2026 Budget Proposals, as at January 2025

1. Introduction

- 1.1 This document provides a cumulative view of the impact of major budget saving proposals currently being progressed as of January 2025 on Denbighshire's people and places. It is based on the evidence provided by officers within the relevant Service areas through Well-being Impact Assessments (WIA), outlines the key findings of the cumulative impact assessment and makes recommendations for next steps.
- 1.2 Given the cumulative nature of this impact assessment, this document includes the impact of savings proposals already delivered for the 2024 to 2025 financial year together with the predicted impacts of savings proposals for 2025 to 2026. Consideration of budget savings remains a continuous process rather than a single event. It is intended that this cumulative assessment continues to be updated as WIAs are revised, and as new budget saving proposals are developed.
- 1.3 This cumulative impact assessment does not factor in the likely expected impacts of the emerging transformation programme, nor does it include consideration of the impact of "efficiencies" (e.g. vacancies). The impact of the latter is managed by Heads of Service and forms part of the scope of annual workforce planning.

2. Approach

- 2.1 Major budget saving proposals that have an impact on Denbighshire's people and places have completed the Council's WIA tool as part of their consideration and development and to aid decision making by Cabinet and the Chief Executive Team (CET). WIA is an important and useful tool in identifying impacts, ensuring exposure of opportunities and consequence and a way of exploring mitigation actions and

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controls. In addition to the proposals from 2024 to 2025¹ (updates regarding the recommendations we made in January 2024 can be found at appendix A), eight new savings proposals for the financial year 2025 to 2025 have been included in this cumulative assessment (as of January 2025) and are as follows:

- Charging for street naming
- New income from the issuing of licenses for certain procedures
- Annual increase of parking fees
- Review of local authority school improvement services
- Review of contracts and contributions to third parties in light of changes to grants and other income streams available
- Review of commercial rents
- Review of Tourism function
- Council Tax 2025 to 2026

2.2 The cumulative assessment work has been undertaken by officers within the Council's Strategic Planning Team. The framework for assessing and analysing the cumulative impacts of savings proposals to date is based on the evidence provided by officers through the WIA tool, and takes into account important legislation:

- Welsh Language (Wales) Measure 2011
- The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and The Equality Act (Authorities subject to the Socio-economic Inequality Duty) (Wales) Regulations 2021
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

¹ Review of Libraries Provision; Car Parking fees; Reduction to capital investment in highways; Social Care Packages and Homelessness prevention; Public Conveniences; Asset Strategy; School Budgets and Increase in Council Tax. See [appendix 5 of item 5](#) for the cumulative impact assessment as at January 2024.

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- Local Government and Elections (Wales) Act 2021

- 2.3 A core pillar of the approach is about balancing the needs of the present with the needs of future generations. This framework considers the sustainable development principle and considers risks for the future.
- 2.4 Evidence within the saving proposals WIAs has been reviewed and summarised. In some cases, existing WIAs have been challenged by officers within the Council's Strategic Planning Team where it is felt there is some possible optimism (and in some cases pessimism) bias. In these cases, overall impacts have been amended (e.g., from positive to neutral or negative to neutral) and indicated where impacts are probable or possible, pending additional evidence.
- 2.5 Taking the budget saving proposals together and analysing the distribution of their impact, conclusions have been drawn about those impacts and whether certain people, groups or places are affected differentially or disproportionately negatively impacted. Where a negative impact has been identified, an analysis of the 'impact severity' has been provided based on Public Health Wales methodology. This is to provide members and officers with an understanding as to the extent or degree to which a negatively identified impact may affect people or places (minimal, moderate, or major).
- 2.6 It should be noted that savings proposals are at different stages. Some are further developed and have a more comprehensive WIA. Some remain in development (such as those relating to Adult Social Care and Homelessness and the review of the Tourism function). Some WIAs tend to be in the form of a light-touch screening of impacts, with some gaps and a lack of supporting evidence. Capacity in some areas is affecting our ability to carry out thorough WIAs in a timely manner.

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3. Summary of findings: cumulative impact for people and places in Denbighshire

3.1 The table below provides a summary of the analysis of cumulative impact of savings proposals for 2024 to 2025 and 2025 to 2026 taken together and provides a conclusion on nature of the impact (positive, negative, or neutral) and, where the impact is negative, the possible severity. These latest findings should be viewed cautiously at this stage: this assessment does not take into account those proposals for which the impact is unknown; the review of the impact of the reduction in libraries opening hours is pending; and some WIAs need further development and 'testing'.

3.2 Our previous cumulative impact assessment included in scope a proposal to close public conveniences. The impacts predicted were largely negative (possible) or unknown. Since then, significant work has taken place where the focus instead has been to develop a Draft Local Toilet Strategy 2024-2027, which at the time of writing is open for consultation (ending February 12, 2025).² The council has not therefore closed any public conveniences. Important to note for this cumulative impact assessment is that until such time the consultation is complete, the Strategy updated and approved (including the action plan), the WIA impacts included previously (based on possible closures of public conveniences) have not been included within this cumulative impact assessment. This has resulted in an adjustment to our findings below.

3.3 Other factors to note in this updated cumulative impact assessment include:

² An assessment of the need for toilets in all towns and villages in Denbighshire was completed in October 2024. The draft Strategy includes feedback and findings from the assessment of need and includes an action plan to show how we will work towards meeting the needs of the local population within our current budget for public conveniences. A new WIA has been developed and includes within it a consideration of impact for the economy (and tourism in particular); on health and well-being outcomes; for people with protected characteristics and other vulnerable groups (such as homeless people); and uses as evidence the findings of other research and evidence, such as the STAND NW CIC survey.

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- **Adult Social Care Packages and Homelessness prevention:** Work continues on the development of this proposal and its associated impact assessment. A project management approach has been established, which may result in more detailed WIAs being undertaken as workstreams develop. The impacts that were predicted in last year's cumulative impact assessment have been adjusted in some areas and are more favourable. This is on the basis of process improvements, the preventative focus of the project and following implementation of some aspects of the proposal that have resulted in a neutral or positive (not negative) impact. For example, the merger of Y Bont and Popty and improvements to temporary accommodation and sourcing permanent housing solutions having a more positive impact on Rhyl (as this is an area, disproportionately affected by socio-economic disadvantage, is providing the most emergency accommodation at present).
- **Review of Libraries Provision:** A review of the lessons learnt and savings with respect to use of libraries since the reduction of opening hours (including reflection on whether the WIA was accurate) will take place before the end of March 2025. The overall findings from the original WIA that was undertaken remain part of this cumulative impact assessment. Our aim is to assess the accuracy of the original WIA: to see if the predicted impacts were observed and determine whether any impacts have materialised that we hadn't anticipated. This assessment will be updated as necessary following that review.
- **Reduction to capital investment in highways:** The WIA was based on a change in funding mechanism and the impacts identified are considered to be accurate.
- **Asset Strategy:** Plans to secure a long-term user of Caledfryn have developed at pace with BCUHB set to take over ownership of the site by the end of the financial year (April 2025), pending discharge of conditions related to the sale. Whilst expected impacts for community cohesion have been changed from Negative (possible) to Neutral, this does not affect our overall determination of cumulative impact on "A Wales of Cohesive Communities" (below).

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- Review of Tourism function: this proposal and WIA is early in its development and the impact is unknown. It has therefore not yet been included within the findings of this assessment.
- Review of local authority school improvement services: the WIA is in its early stages. It is our intention that we will develop it further and ensure we consider how we can maximise opportunities before the delivery phase commences (should the proposal be agreed), together with other local authorities and key stakeholders (e.g. schools).
- Review of contracts and contributions to third parties in light of changes to grants and other income streams available: the proposal is at its early stages and the impact is not yet predictable.
- Equality impact of workforce changes from relevant savings since 2024 are included in Appendix B.

Locality Impact	Cumulative impact	Possible severity* where negative (minimal, moderate, or major)	Changes since 2024 and 2025
Rhyl	Negative (possible)	Minimal	Impact downgraded from probable to possible and severity from moderate to minimal. Also pending libraries review.
Prestatyn	Negative (possible)	Minimal	
Elwy	Negative (possible)	Minimal	
Denbigh	Negative (possible)	Minimal	
Ruthin	Negative (possible)	Minimal	
Dee Valley	Negative (possible)	Minimal	
Well-being Goals			
Prosperous Wales	Neutral ³	-	No change.
Resilient Wales	Positive (possible)	-	Impact downgraded from probable to

³ Whilst some proposals could have a negative impact on personal finances, or the financial health of a third party, overall impact for Denbighshire is considered to be Neutral.

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Locality Impact	Cumulative impact	Possible severity* where negative (minimal, moderate, or major)	Changes since 2024 and 2025
			possible. Maximised use of a smaller set of office buildings is better for our carbon emissions but continued use of Caledfryn by another user still results in emissions.
Healthier Wales	Negative (possible)	Minimal	Following engagement with Headteachers and noting the intended positive impacts of adult social care proposals, the impact has been scaled back to possible. Also pending libraries review.
More Equal Wales	Negative (probable)	Moderate <i>(Taken with impacts in areas with socio-economic deprivation the severity could be at least moderate).</i>	No change.
A Wales of Cohesive Communities	Negative (possible)	Minimal	No change.
A Wales of Vibrant Culture and Thriving Welsh Language	Negative (possible)	Unknown	We have been cautious in our determination that the overall impact remains Negative (possible). Whilst schools have not reported any reductions in support for cultural and Welsh-medium provision, this is continually reviewed (and will also be considered as part of the libraries review). The "Review of contracts and contributions to third parties..." is also at its early stages and the

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Locality Impact	Cumulative impact	Possible severity* where negative (minimal, moderate, or major)	Changes since 2024 and 2025
			impact is not yet predictable.
A Globally Responsible Wales	Neutral	-	No change. Although we remain mindful that proposals could impact broader public service provision.
Sustainable Development			
Long Term e.g., impact and opportunities for recovery	Negative (possible)	Unknown <i>(Impacts could be felt over the longer-term, and service standards could be difficult to recover).</i>	Impact reduced to possible. It is worth noting that some proposals will place council services on a more sustainable footing.
Prevention e.g., likely impact on public service partners (and impact on demand for services)	Negative (possible)	Minimal to moderate	
Integration e.g., of sustainable development into all aspects of operation	Unknown	Unknown	No change. Some proposals could result in positive impacts and others negative. All need to consider their impact on wider organisational objectives.
Collaboration e.g., between departments, organisations, and sectors	Unknown	Unknown	No change. Some proposals do not consider impact on partners. Subject to how the savings proposals are achieved there could be some impact on opportunities for collaboration.
Involvement e.g., extent to which community can be involved and shape the proposal	Negative (probable)	Moderate.	No change.

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**Possible severity is based on Public Health Wales Methodology and descriptions as follows:*

- *Major: Significant in intensity, quality, or extent. Significant or important enough to be worthy of attention, noteworthy.*
- *Moderate: Average in intensity, quality, or degree.*
- *Minimal: Of a minimum amount, quantity, or degree, negligible.*

3.4 Overall, whilst there is a largely negative impact for all areas in the County, the likely severity across some factors has been reduced from last year's probable determination to possible. This change reflects the experience we have had in implementing some of the proposals over the course of the last year and changes to what is within the scope of this assessment (i.e. public conveniences closures not being pursued; more clarity about adult social care proposals taking a preventative approach to delivering savings). That said, it remains the case that impact is likely to be most acutely felt in areas with existing socio-economic disadvantage, and areas where it is more likely that people with protected characteristics live (which, the [evidence](#) suggests, tends to be areas of disadvantage). Pre-existing well-being inequality could be exacerbated for people (including children, young people and families) due to reduced capacity and potential reduced non-statutory provision in schools⁴, and new or increased charges for services such as street naming, parking and Council Tax as examples (although the latter may be offset by the Council Tax Reduction Scheme). All of which is more likely to most negatively affect vulnerable or disadvantaged people. However, subject to mitigations being successful, some

⁴ For example, it is not possible to identify the actual impacts for each school here as schools' budgets are delegated. It is also not possible to say that the following summary of impacts are solely a consequence of the 3% budget cut given the other contextual factors at play (see appendix B). In summary though, well-being support (particularly on a one-to-one basis, which is regarded as being more effective than whole class support), extra-curricular activities and the range and depth of the curriculum taught in some schools has reduced. Schools are identifying increasing mental health needs among some learners, particularly since Covid-19, with reducing staff capacity (at teaching, teaching support and strategic levels). Impacts could be more or less severe depending on schools' financial positions, and the level of need within the school/community.

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proposals could have impacts that amount to some short-term disruption. It is worth reiterating here that these conclusions should be viewed cautiously at this stage: this assessment does not take into account those proposals for which the impact is unknown (e.g. tourism review), the review of the impact of the reduction in libraries opening hours is pending and some WIAs need further development and 'testing'.

- 3.5 The severity of negative impacts for people in areas of socio-economic disadvantage / possessing one more protected characteristic is minimal or moderate and largely depends on how proposals can reduce negative impacts or design them out entirely, either by changing our proposals and / or by working alongside our partners. That being said, the proposals - particularly those that relate to an increase in charges - balance the impact on individuals (i.e. rate payers) against safeguarding core council services upon which many vulnerable residents depend.
- 3.6 The proposals offer some potentially positive long-term gains for sustainable development, e.g., by reducing our carbon emissions or by strengthening our preventative approach through our social care proposals. However, the need to deliver savings quickly means that proposals are unlikely to be perfect in terms of whether they can safeguard the well-being of future generations; whether the proposals have been developed and informed by those affected by them; and in terms of how a proposal from one service could deliver budget savings in one area but potentially increase costs or demands in another. Previously, it was observed that there was little scope for communities to have their say on savings proposals. This time around, for some proposals, such as the Denbighshire Local Toilets Strategy, timescales are more favourable resulting in more research, needs assessment, engagement and consultation. It is likely that over the long-term, some proposals may result in poorer performance and standards but this needs to be tested through the review of the impact of the reduction in library opening hours as an example, which, it is hoped, will provide valuable insights into the accuracy of both the impact assessment process and the effectiveness of identified mitigations. What is clear is that in order to place some of our services on a sustainable footing

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we are having to introduce charges for the first time or increase charges. This year's settlement is certainly more favourable; relieving the pressure to make service reductions or cuts. That being said, service changes and reductions are still required and have occurred, and more will need to be explored. The ability to improve and recover is unknown at this time and depends on the extent to which services could be readily built back up again should financial recovery and investment into public services occur sooner or to a greater extent than might be expected, and in line with the long-term vision of the council.

4. Recommendations⁵

- 4.1 This cumulative impact assessment should be updated promptly once proposals are more clearly developed.
- The WIA for the “Draft Denbighshire Local Toilets Strategy” should be revisited and developed further once the consultation has ended.
 - The continued development of the “Adult Social Care Packages and Homelessness prevention” WIA, and any more detailed WIAs for its transformation workstreams, should avoid risks associated with optimism bias and note potential short-term disruption during any change to service delivery. Opportunities to ensure stakeholders are involved in the development of the proposal(s) and WIA(s) should be explored.
 - The “Review of commercial rents” WIA should be reviewed as the proposal and mitigating actions are implemented.
 - WIAs for the “Review of local authority school improvement services” and the “Review of contracts and contributions to third parties in light of changes to grants and other income streams available” should be reviewed as proposals develop.

⁵ Updates regarding the recommendations we made in January 2024 can be found at appendix A.

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- The “Review of Tourism” WIA should be included within this assessment once the proposal, and/or options, are clarified.

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Appendix A: Summary of recommendations from Cumulative Impact Assessment January 2024 and update as at January 2025

Recommendation	Update on progress January 2025
<p>All WIAs, but less developed ones in particular, will need to be revisited and updated as proposals develop. As proposals develop, mitigating controls should be identified through the WIA process to help minimise the severity of impact.</p>	<p>A workshop was held with all Headteachers on June 18, 2024, to discuss the WIA and opportunities to work collaboratively to ameliorate risks. Further information on the latest position regarding the 2024 to 2025 3% budget reduction to schools and workforce can be found in appendix B.</p> <p>Work continues on the development of the Social Care Packages and Homelessness prevention proposal and associated impact assessment. This work will continue well into 2025 to 2026 and possibly beyond. A project management approach has been established, which may result in more detailed WIAs as workstreams develop.</p>
<p>All existing and new WIAs should be undertaken as a group. Officers should seek advice from the Strategic Planning Team where there is uncertainty as to who to involve, or where facilitation may be required. Officers should engage, where that is possible, with groups likely to be affected.</p>	<p>Our leadership team and Cabinet has discussed the importance of their role in both the process of impact assessment and decision making (September and October 2024), and a workshop was held with the project forum in November to explore how to maximise the value of impact assessments.</p>
<p>Going forward, in line with budget savings being considered as continuing process rather than a single event, impact assessment will also need to be a continual process. All major budget saving proposals which have an impact on Denbighshire's people and places must continue to complete the Council's WIA tool as part of their consideration and development. Impacts should be identified as confirmed, probable or possible. The Strategic Planning Team should continue to appraise and update the cumulative impact assessment to support CET and Cabinet in keeping a watchful eye</p>	<p>The cumulative assessment has been updated to include some workforce impact and the findings of this are presented within this report.</p> <p>A report was also taken to the Strategic Equality and Diversity Group in October to review and evaluate the approach to cumulative impact assessment. It was agreed that the Group will continue to look at the cumulative impact assessment as it develops following the 2025 to 2026 budget.</p>

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Recommendation	Update on progress January 2025
on overall impacts arising from the whole set of budget proposals.	
The council should share its assessment work with the Denbighshire Voluntary Services Council (DVSC) and the North East Wales Community Cohesion Team to look at ways in which we can support each other and mitigate any unintended disproportionately negative impacts. A meeting to do so with representatives has already been arranged for January 22.	Tom Barham, Chief Officer, DVSC joined Council Briefing in February 2025 to discuss the impact of budgets and budget proposals on the voluntary sector in Denbighshire.

Appendix B- Equality impact: workforce – cumulative impact of 2024 to 2025 and 2025 to 2026 savings proposals

This table includes only those savings proposals to date where there has been a reduction/change in service affecting staff. There is no known negative impact to date that has disproportionately affected staff with protected characteristics. No impacts on skills and training or risks for remaining capacity and resources have been identified

	Number of staff affected	Number of redundancies	Grades of staff affected	Impact on staff with one or more protected characteristic	Comments
Voluntary exit scheme	CET received 138 applications. 44 were approved. 33 employees agreed to the exit.	33 <u>voluntary</u> exits	6 x Grades 1-5 18 x Grade 6-10 9 x Grade 11 and above	20 males : 13 females Age range: 1 x aged 20-29 2 x aged 40-49 12 x aged 50-59 18 x aged 60+	
Libraries hours reduction	34: 6 <u>voluntary</u> redundancies and 28 staff with a reduction in hours	6 <u>voluntary</u> redundancies	5 x Grade 3 2 x Grade 4 27 x Grade 5	In terms of those staff affected by a reduction in hours 5 are male and 23 are female. It is important to bear in mind that 73% of our workforce are female.	The proposal has been implemented. A review of the lessons learnt and savings since reduction of opening hours (including reflection on whether the WIA was accurate) will take place before the end of March 2025.
Rationalisation of the Council's Corporate Office Accommodation portfolio	314 staff were moved to new locations			49% males : 51% females	9% of staff affected have no change to mileage, 65% have an increase in mileage, and 27% a reduction. Those that saw an increase are entitled to a disturbance allowance of

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	Number of staff affected	Number of redundancies	Grades of staff affected	Impact on staff with one or more protected characteristic	Comments
					16.4p per mile on a sliding scale of four years.
Schools budget savings	There is evidence of school staff numbers reducing but so far, we are not aware that this is directly due to the 3% budget saving required by schools. Schools' budgets are delegated and some schools manage staff changes and voluntary exits routinely, year on year, in part due to changes in pupil numbers for example, which affect schools' budgets. There are other contextual factors and forces at play that are also relevant. Schools were awarded additional recovery monies post-Covid 19 and these were used, in some cases, to appoint additional staff members on fixed term	We are not aware of any formal redundancies being considered or pursued as a result of the 3% cut. As at January 2025, the council is aware of 29 <u>voluntary</u> redundancies in six schools. Most of these voluntary redundancies took place during the summer of 2024, with one taking place in December 2024. It is not possible to link these redundancies at individual schools	6 x Teachers 6 x Teaching Assistants 13 x Lunchtime Supervisors (<i>12 at one school</i>) 4 x Support Staff (various) Equates to 14.75 FTEs	5 males : 25 females	Of the total of 54 schools across the county, approximately 50% are forecasting to be in financial difficulty and are being supported by the council. Some schools are using their reserves, which decreased to £3.7m at the end of 2023 to 2024. Current indications suggest these may fall to a negative -£2.2m by the end of 2024 to 2025, a further reduction of £5.9m. This is around 27 schools in deficit (ranging from deficits of smaller £000s to £900k). Some schools are operating with a deficit because they have been unable to reduce or stop aspects of provision safely; without compromising the

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	Number of staff affected	Number of redundancies	Grades of staff affected	Impact on staff with one or more protected characteristic	Comments
	contracts. Some of those contracts will have reached, or will be reaching their end and have not, or will not, be renewed. Any comparison of school staff numbers today therefore needs to be made with data from 2019. Furthermore, following Covid-19, some families opted to switch from Welsh to English medium education. This resulted in a smaller pupil population in some schools, which affected the school's allocated budget (based on the number of pupils).	with the 3% budget cut.			safety and well-being of the school community.
Review of tourism function	1	1	Disclosive information.	Disclosive information.	