Report to the Finance & Performance Management Cabinet Committee

Report reference:	***FCC-022-2009/10***
Date of meeting:	***25 January 2010***

Epping Forest District Council

Portfolio: **Finance and Economic Development.**

Subject: **Council Budgets 2010/11**

Responsible Officer:	**Bob Palmer**	**(01992 564279).**
Democratic Services Officer:	**Gary Woodhall**	**(01992 564470).**

Recommendations/Decisions Required:

(1) That the Committee considers the Council's 2010/11 General Fund budgets and makes recommendations to the Cabinet meeting on the 1 February 2010 on adopting the following:

(a) the revised revenue estimates for 2009/10, which are anticipated to reduce the General Fund balance by £837,000;

(b) an increase in the target for the 2010/11 CSB budget from £18m to £18.1m (including growth items);

(c) an increase in the target for the 2010/11 DDF net spend from £1.3m to £1.4m;

(d) an increase of 2.5% in the District Council Tax for a Band 'D' property to raise the charge from £146.61 to £150.30;

(e) the estimated reduction in General Fund balances in 2010/11 of £497,000;

(f) the four year capital programme 2010/11 – 13/14;

(g) the Medium Term Financial Strategy 2010/11 – 13/14; and

(h) the Council's policy on General Fund Revenue Balances to remain that they are allowed to fall no lower than 25% of the Net Budget Requirement;

(2) That the Committee recommends to the Cabinet that the 2010/11 HRA budget including the revised revenue estimates for 2009/10 be agreed;

(3) That the Cabinet be requested to note that rent increases and decreases proposed for 2010/11 are to be applied in accordance with the Government's rent reforms and the Council's approved rent strategy with the addition of an extra element to give an average overall increase of 2.4%;

(4) That the Committee recommends to the Cabinet that the established policy of capitalising deficiency payments to the pension fund is maintained, in accordance with the Capitalisation Direction request made to the Department for Communities and Local Government;

(5) That the Committee considers the Council's Prudential Indicators and Treasury Management Strategy for 2010/11 and makes recommendations to the Cabinet; and

(6) That the Committee notes the Chief Financial Officer's report to the Council on the robustness of the estimates for the purposes of the Council's 2010/11 budgets and the adequacy of the reserves.

Executive Summary:

This report sets out the detailed recommendations for the Council's budget for 2010/11. The budget uses £0.5m of reserves but this is affordable and the Council's policy on the level of reserves can be maintained throughout the period of the Medium Term Financial Strategy. Over the course of the Medium Term Financial Strategy the budget will be brought back into balance.

The budget is based on the assumption that Council Tax will increase by 2.5% and that average Housing Revenue Account rents will increase by 2.4%.

Reasons for Proposed Decision:

The decisions are necessary to assist Cabinet in determining the budget that will be placed before Council on 16 February 2010.

Other Options for Action:

Members could decide not to approve the recommended figures and instead specify which growth items they would like removed from the lists, or Members could ask for further items to be added.

Report:

1. On 1 February 2010 the Cabinet will receive the minutes and recommendations contained therein of this meeting and will then make recommendations to Council for the setting of the Council Tax and budget on 16 February 2010.

2. The annual budget process commenced with the Financial Issues Paper being presented to this committee on 5 October 2009. The paper was prepared against the background of ongoing difficulties within the economy and highlighted the uncertainties associated with:

(a) likely reductions in grant as part of the next Comprehensive Spending Review (CSR);

(b) effects of the "Credit Crunch" and reduced activity in the housing market;

(c) using up of capital reserves on non-revenue generating assets;

(d) pay awards;

(e) next triennial pension valuation;

(f) capitalisation of pension deficit payments;

(g) changes to the statutory concessionary fares scheme; and

(h) Customer Services Transformation Programme.

3. There is now greater clarity on some of these issues, but several of them will not be resolved for some time. The key areas are revisited in subsequent paragraphs.

4. In setting the budget for the current year Members had anticipated using £704,000 from the general fund reserves. It was felt that, given the strength of the Council's overall financial position, it was able to sustain a deficit budget to support the local economy and that net spending could be managed down over the medium term.

5. The revised four year forecast presented with the Financial Issues Paper took into account all the additional costs known at that point and highlighted the likely reduction in grant support of 10% over the next CSR period. This projection showed a need to achieve savings of £300,000 on the 2010/11 estimates, £600,000 in 2011/12, £400,000 in 2012/13 and £200,000 in 2013/14 to keep revenue balances above the target level at the end of 2013/14.

6. Members adopted this measured approach to reduce expenditure in a progressive and controlled manner. It was felt that a reduction was needed in the budget figures for 2010/11 as the first step in this process, followed by increased savings in 2011/12.

7. The budget guidelines for 2010/11 were therefore established as:

(a) The ceiling for CSB net expenditure be no more than £18.3m including net growth/savings;

(b) The ceiling for DDF net expenditure be no more than £0.8m; and

(c) The District Council Tax be increased by no more than 2.5%.

8. In view of the stabilising of some of the income streams, the clearer cost and recycling credit increases on waste management and the slippage in the DDF programme, these guidelines were revised by the 14 December meeting of this committee. The target for the Council Tax increase was unchanged but the other guidelines were amended to:

(a) The ceiling for CSB net expenditure be no more than £18m including net growth/savings; and

(b) The ceiling for DDF net expenditure be no more than £1.3m.

<u>The Current Position</u>

9. The draft General Fund budget summaries are attached as annexes 1 to 8. The main year on year resource movements are highlighted in the CSB Growth and DDF lists, which are attached as Annexes 9 and 10. In terms of the guidelines, the position is set out below.

<u>The ceiling for CSB net expenditure be no more than £18m including net growth</u>

10. Annex 9 lists all the CSB changes for next year. Some of the growth items listed are for sums agreed as part of previous year's budgets but most are new for next year. The largest growth item for next year is £92,000 for the increase in employer's contributions for the pension fund, being the last of the annual 1% increases determined by the March 2007 triennial valuation.

(i) Likely Reduction in Grant as part of the next CSR

11. This is one of the key areas which are still to be clarified and the extent of the reduction is unlikely to be confirmed until several months after the general election. Whoever is in power after the general election will have to significantly reduce public spending to achieve the necessary improvement in the state of the overall public finances. It has been well documented that the bail out of the financial sector and effective nationalising of some of the countries largest banks has put an unprecedented strain on the public finances. Every month as the Government borrowing figures are announced they establish new records and it is clear that the current position is not sustainable.

12. Whilst the banking sector has now stabilised it is likely to still be several years before a full return to private ownership is possible. This means solutions must be found in other areas and there are already suggestions that an incoming Government will need to cut big programmes such as identity cards and the replacement of Trident. However, the size of the problem makes it inevitable that local government will have to share some of the pain. Best estimates are that grant will fall 10% over the next CSR with the reduction in the first year likely to be 5%. This means in 2011/12 grant is likely to reduce by £471,000 and over the three year CSR grant support could fall by £1m.

(ii) The "Credit Crunch" and Reduced Housing Market Activity

13. The Council's CSB contains a number of income streams that have been adversely affected, to varying degrees, by the current state of the housing market. Recent surveys have been more positive, although while banks remain cautious with mortgage funding and developers wait for better rates of return any recovery in the housing market is likely to remain fragile.

14. The main areas of income related to the housing market are land charges, building control and development control. For 2009/10 land charges income had been estimated at £150,000, consistent with the actual of £146,000 for 2008/09 but a long way from the 2006/07 figure of £394,000. At the end of December the income achieved was ahead of the estimate and a full year figure of £170,000 may be achieved. Building Control fees are still well short of the estimate but officers are confident that fees from major schemes will arrive before the year end to leave a shortfall of no more than £40,000. Development Control income will also fall short of the original estimate with the outturn likely to be closer to £550,000 than the £605,000 originally estimated.

15. It is worth noting that some of the Council's other income streams are doing well. The MOT income from Fleet Operations may exceed the estimate of £225,000 by £75,000. Total licensing income is also ahead of expectations and should exceed the estimate of £252,000 by £40,000.

16. Adjustments have been made to CSB income levels where the changes are thought to be ongoing and where it is more likely that a change will not be sustained the adjustment has been made to the DDF.

17. One beneficial effect of the "Credit Crunch" had been the higher interest rates in 2008/09 that banks have been prepared to pay to borrow from the Council. It was evident that this would not continue for long and so £334,000 of investment income was credited to the DDF in 2008/09 instead of the CSB. Investment income this year is behind the estimate as interest rates have fallen lower than anticipated and seem set to remain at 0.5% for months to come. The outturn is likely to be £400,000 short of the original estimate of £2.1m, although a large portion of this is credited to the HRA. The Medium Term Financial Strategy (MTFS) has taken a prudent view on future interest rate movements, based on advice from the

Council's treasury management consultants.

(iii) Using up of Capital Reserves on Non-Revenue Generating Assets

18. In recent years the Capital Strategy has stressed the need for capital projects to be used to improve the Council's revenue position, either by saving costs or increasing revenues. This issue has also been recognised on the Council's Corporate Risk Register. Capital receipts generate investment income and so if they are used up on non-revenue generating assets there is a "double whammy" whereby the Council looses out on income and takes on additional costs.

19. The updated Capital Programme was approved by Council on 22 December and includes spending of £54.3m over five years. Of this spending, £40m is funded from revenue or grants but the remainder will reduce the balance of capital receipts from £24.3m to £9.9m. In view of this Members should carefully consider whether existing schemes are essential and any additional schemes should only be approved where there is a positive revenue contribution, after allowing for any loss of investment income.

(iv) Pay Awards

20. Negotiations for 2009/10 have again been protracted and have resulted in a settlement of 1.25% for the lowest paid staff (scale points 4 to 10) and 1% for most other staff (scale point 11 up to and including Assistant Directors). Directors and Chief Executives received no increase in 2009/10.

21. Against the backdrop of the negotiations it is worth considering this Council's pay bill and the effect that different levels of pay awards might have. The total salary estimate for 2009/10 is £20m; therefore for every 1% the pay award increases the Council's pay bill by £200,000. The annual pay bill is one of the key parts of the Council's overall estimates and so the assumptions made about pay awards are particularly significant. In the current economic climate with the overall public finances in a poor state it is difficult to envisage pay awards exceeding 1.5% for the foreseeable future, although if inflation starts to increase this assumption may not prove correct.

(v) Next Triennial Valuation of the Pension Scheme

22. Similarly to the ongoing level of grant support, this is an item which will not be clarified for some time. The last triennial valuation was undertaken as at 31 March 2007 and showed a significant improvement on the 2004 valuation. As at 31 March 2004 the scheme was only 71% funded (the value of the scheme's assets only covered 71.4% of the liabilities), by 2007 the funding level had improved to 81.2%. This meant that it was possible to reduce the amount of the deficit contributions but due to other factors, such as increasing life expectancy, it was necessary to increase the ongoing contribution rate from 10.1% for 2007/08 to 13.1% for 2010/11.

23. The rally in share prices mentioned in the Financial Issues Paper has continued, with the FT100 share index having gone back above the 5,500 level. This is encouraging but is still 7% below where the index was at the last scheme valuation date. As approximately 70% of the schemes assets are invested in shares, any reduction in the index before 31 March 2010 is likely to increase the overall deficit.

24. A number of changes have been made to the LGPS, with increased contribution rates for employees and a rising of the normal retirement age. Further options for reform are being examined and it is possible that in the long term the defined benefit scheme could be closed to new entrants or pensions could be based on average earnings instead of final salary.

(vi) Capitalisation of Pension Deficit Payments

25. Capitalisation applications for 2009/10 for both the general fund (£1,205,000) and the housing revenue account (£565,000) have been submitted to the DCLG. The DCLG are maintaining their policy of not confirming the amount of capitalisation directions until the end of January, so this too remains an area of uncertainty.

(vii) National Concessionary Fares Scheme

26. Members will be aware from the report to Cabinet on 4 January that it is likely that the Council will lose £137,000 of the £247,000 special grant for concessionary fares that had been anticipated. A greater potential threat lies beyond 2010/11 with the removal of this function from districts and the associated re-working of the grant formula which could adversely impact on the Council's overall financial position. It is also worth reminding Members that not all of the appeals raised by the bus operators have been settled and further costs may still arise from these.

(viii) Customer Services Transformation Programme

27. It is still to be determined exactly what works will take place as part of this programme. No CSB or DDF amounts have been included for this initiative but some £1.3m of expenditure is still included in the capital programme. This has been re-scheduled with £837,000 moving to 2010/11 and £450,000 to 2011/12.

28. The General Fund summary at Annex 1 shows the CSB total is £79,000 above the CSB target of £18m. If Members require a total closer to the £18m target it will be necessary to reduce or remove some of the items listed on Annex 9. However, Members may feel that the amount by which the target has been exceeded is not significant and, in view of the position outlined in the Medium Term Financial Strategy, is acceptable.

The ceiling for DDF net expenditure be no more than £1.3m

29. The DDF net movement for 2010/11 is £1.358m, Annex 10 lists all the DDF items in detail. The largest cost item is £508,000 for the reduction in investment income followed by £400,000 for work on the Local Development Framework (LDF). The LDF is a substantial and unavoidable project and in 2009/10 and the subsequent two years DDF funding of £1.176m is allocated to it. The Director of Planning and Economic Development has been asked to provide regular updates to Cabinet to monitor this project and the expenditure incurred on it.

30. Other significant items of expenditure include £147,000 for the planned building maintenance programme. Allowance has also been made in the DDF for the reduction of £137,000 in special grant for concessionary fares mentioned above.

31. Officers are currently working with an international firm of accountants to examine the possibility of recovering VAT. This is using a model that the firm has developed through working with a number of authorities which has led to some substantial repayments. It is too early yet to predict what, if any, income may arise from this so no allowance has been made in the estimates. The work is being conducted on a "no win no fee basis" so any costs will be funded from any VAT refund arising.

32. At £1.358m the DDF programme is £58,000 above the target for 2010/11. The DDF is predicted to come under financial pressure in 2011/12 and may need support from the General Fund Reserve in that year. However, given that the DDF often sees items being re-phased this may not ultimately be necessary and both 2012/13 and 2013/14 currently show

net income for the DDF.

The District Council Tax be increased by no more than 2.5%

33. At the meeting of this committee on 8 December 2008, Members established a policy of not increasing the Council Tax by more than 2.5%. This is reflected in the estimates for 2010/11 and throughout the Medium Term Financial Strategy.

That longer term guidelines covering the period to March 2014 provide for:

The level of General Fund revenue balances to be maintained within a range of approximately £4.0m to £4.5m but at no lower level than 25% of net budget requirement whichever is the higher;

34. Current projections show this rule will not be breached by 2013/14, by which time reserves will have reduced to £6.659m and 25% of net budget requirement will be £4.319m.

Future levels of CSB net expenditure being financed predominately from External Funding from Government and Council Tax and that support from revenue balances be gradually phased out.

35. The outturn for 2008/09 added £973,000 to reserves, whilst the revised estimates for 2009/10 anticipate a reduction of £837,000. This would leave the opening revenue reserve for 2010/11 at £7.4 million and although the estimates for 2010/11 show a reduction of £497,000, reserves would still be above £6.8m. The Medium Term Financial Strategy at Annex 11 shows deficit budgets for the three years 2010/11 to 2012/13. The level of deficit peaks at £837,000 in 2009/10 and returns to break even in 2013/14, although this is achieved through CSB savings of £600,000 in 2011/12, £400,000 in 2012/13 and £200,000 in 2013/14.

The Local Government Finance Settlement

36. The Government have confirmed that the draft figures previously advised will not be amended. To remind Members of the three-year settlement and the background to it the information below has been repeated from the 2009/10 Council Tax setting report.

37. After one two-year settlement under the new four block system, the Department for Communities and Local Government (DCLG) announced a consultation to “update and fine tune” the model to produce a three-year settlement. Unfortunately the fine-tuning has resulted in some substantial movements in the Council’s relative position. The table below sets out the Council’s amounts in each of the four blocks for the five years of data now available. The Relative Needs Amount (what the Government believes the Council needs to spend) has increased by only £7,000 for 2010/11 whilst the Relative Resource Amount (a negative amount to reflect the ability to raise income from Council Tax) has reduced by £140,000. This improvement of £147,000 is strengthened by an increase in the Central Allocation of £37,000 although most of this is then eliminated by a change in the net Floor Damping position of £137,000.

38. The figures shown below represent a poor CSR for the Council with grant increases of only 1% (against the adjusted 07/08 figure) for 2008/09 and only 0.5% for 2009/10 and 2010/11. This seems odd given the sizeable grant increase seen under this system for 2006/07 and 2007/08.

	2006/07 £m	2007/08 £m	2008/09 £m	2009/10 £m	2010/11 £m
Relative Needs Amount	5.728	5.742	5.455	5.457	5.464
Relative Resource Amount	-4.465	-4.724	-5.228	-5.096	-4.956
Central Allocation	7.854	8.332	8.793	8.834	8.871
Floor Damping	-0.490	-0.189	0.302	0.173	0.036
Formula Grant	**8.627**	**9.161**	**9.322**	**9.368**	**9.415**

	2006/07 £m	2007/08 £m	2008/09 £m	2009/10 £m	2010/11 £m
Formula Grant (adjusted)	8.627	9.161 (9.229)	9.322	9.368	9.415
Increase £	0.711	0.534	0.093	0.046	0.047
Increase %	9.0%	6.2%	1.0%	0.5%	0.5%

39. The introduction of the four block system saw the Council change from receiving floor support of £412,000 to loosing £490,000 to support the floor for others. It had been hoped that the move away from the floor would last longer than two years. However, the benefit of the previous large increase has not been lost, as this has provided the base that the floor increases have been added to.

The 2010/11 General Fund Budget

40. Whilst the position on some issues is clearer now than it was when the Financial Issues Paper was written there are still significant risks and uncertainties for 2010/11. Signs of improvement in the economy are evident but weak and the gains seen so far may yet be reversed when Quantitative Easing finishes or if public spending is cut too soon or too far. The effects of the recession are clear and as well as impacting on many of the Council's revenue streams it is has placed additional demands on services such as benefits and homelessness. It is still possible that the country may fall back into a severe recession that may last some years. If this is the case then the adjustments made to property related income and investment income will need to be revised.

41. Another major area of uncertainty is how a new government will tackle the deficit in the public finances and how much of any spending reductions will fall on district councils. The Medium Term Financial Strategy is based on a 10% reduction over the next CSR, this sees grant fall from £9.4m in 2010/11 to £8.5m in 2013/14. This represents a best guess and it is prudent to allow for such a reduction. The actual reduction will depend on the outcome of the election and the state of the economic recovery when the next government is working through their CSR.

42. A final area worth touching on is the accounting treatment for impairments on investments. The Government previously mandated the deferral of impairments to 2010/11, apparently to allow for a clearer picture to emerge on the level of recoveries. Even though a clear picture has not emerged and the ultimate levels of impairments are far from certain, the Government has stated that no extension of the deferral will be allowed. The Government has also stated that authorities should not charge the impairment to the HRA, although capitalisation directions can be applied for in 2009/10.

43. The likely impairment that this Council will have to account for is £700,000. As the investment balances were generated partly from the sale of HRA assets and the HRA receives approximately two thirds of interest earned it would be logical for the HRA to share the impairment charge. Therefore, the DCLG have been asked to reconsider their decision

and it is hoped that a reply will be received before the end of January. Given the ongoing uncertainty around the ultimate level of the impairment, the year in which it will have to be accounted for and the funds it can be charged to no allowance for the impairment has been made in these figures.

44. The starting point for the budget is the attached Medium Term Financial Strategy, Annex 11. Annexes 11a and 11b are based on the current draft budget, a Council Tax increase of 2.5% (£150.30 Band D) for 2010/11 and subsequent increases of 2.5% per annum for each of the following three years in accordance with the strategy of not increasing Council Tax by more than this amount.

45. Members are reminded that this strategy is based on a number of important assumptions, including the following:

- Future Government funding over the next CSR will reduce by 10%;
- CSB growth has been restricted but still exceeds the CSB target for 2010/11 of £18 million. Known growth beyond 2010/11 has been included but will be subject to a further review to help identify savings;
- All known DDF items are budgeted for, and because of the size of the LDF programme the closing balance at the end of 2013/14 is anticipated to reduce to £286,000; and
- Maintaining revenue balances of at least 25% of NBR. The forecast shows that the deficit budgets for three years of the period will reduce the closing balances at the end of 2013/14 to £6.577m or 38% of NBR for 2013/14, although this can only be done with further substantial savings throughout the life of the strategy.

The Housing Revenue Account

46. The balance on the HRA at 31 March 2011 is expected to be £6.09 million, as shown in Annex 12a, after deficits of £25,000 in 2009/10 and £7,000 in 2010/11. There are no significant variances worth highlighting at this time.

47. The rent increase is set with reference to an individual property's formula rent but subject to various constraints. This process of Rent Restructuring to bring Council rents and Housing Association rents more in line with each other still needs to be addressed. The rent increase for 2010/11 is likely to see a narrowing of this gap between Council and Housing Association rents, with an average rent increase of 2.4% for Council dwellings.

48. An update to the current five-year forecast is being prepared and will be presented to a subsequent Cabinet. The HRA has had substantial balances for some time and this position is not expected to change in the short term.

49. Annex 12b shows the estimated balances for the Housing Repairs Fund and Annex 12c the same for the Major Repairs Reserve. Members are recommended to agree the budgets for 2010/11 and 2009/10 revised and to note that although a deficit budget is proposed for 2010/11 the HRA has substantial ongoing balances.

The Capital Programme

50. The Capital Programme at Annex 13 shows the expenditure previously agreed by Cabinet and approved as part of the Capital Strategy by Council on 22 December 2009. Members have stated that in future priority will be given to capital schemes that will generate revenue in subsequent periods. This position has been stated in previous Capital Strategies and has been reinforced by the increasing awareness that capital spending reduces

investment balances and thus impacts on the general fund revenue balance through lower interest earnings.

51. Annex 13d sets out the estimated position on capital receipts for the next four years. Members will note that even with a substantial capital programme, which exceeds £54m over five years, it is anticipated that the Authority will still have nearly £10m of usable capital receipt balances at the end of the period. It is not anticipated that further disposals of surplus land will take place during 2010/11, or in the medium term until market conditions have improved. However, it should be noted that officers are currently reviewing the development potential of a number of sites.

Risk Assessment and the Level of Balances

52. The Local Government Act 2003 (s 25) introduced a specific personal duty on the "Chief Financial Officer" (CFO) to report to the Authority on the robustness of the estimates for the purposes of the budget and the adequacy of reserves. The Act requires Members to have regard to the report when determining the Council's budget requirement for 2010/11. ***Where this advice is not accepted, this should be formally recorded within the minutes of the Council meeting.*** The Council at its meeting on the 16 February will consider the recommendations of the Cabinet on the budget for 2010/11 and will determine the planned level of the Council's balances. Members will consider the report of the CFO as set out at Annex 14 at that meeting.

The Prudential Indicators and Treasury Management Strategy 2010/11

53. Since 2004/05 it has been necessary to set affordable borrowing limits, limits for the prudential indicators and a Treasury Management Strategy. These elements of the budget requirements are set out in a separate report as Annex 15.

54. Members approved a Treasury Management Strategy on 19 February 2004, which has been updated and amended on annual basis. Investment balances had increased substantially and, as part of the 2007/08 budget, the limit on funds invested for over 364 days was raised from £15m to £30m and the maximum amount to be invested with higher rated counter parties was increased from £8m to £12m.

55. Given the instability in money markets a more prudent approach was being taken to counter parties and some institutions are no longer being dealt with even though they satisfy the credit rating requirements. As part of this approach the maximum amount to be invested was reduced to £10m and building societies without credit ratings were removed from the counter party list. As the first priority is to safeguard the Council's investment funds, it is not proposed to reduce the existing counter party requirements.

Resource Implications:

The report details proposed growth items and potential savings, the implications are set out above and will vary depending on the course of action decided by Members.

Legal and Governance Implications:

None.

Safer, Cleaner and Greener Implications:

Items related to the Safer, Cleaner, Greener initiative are included in the report.

Consultation Undertaken:

None.

Background Papers:

Financial Issues Paper – see agenda of 5 October 2009
Draft Growth List – see agenda of 23 November 2009
Draft General Fund Budget Summary – see agenda of 14 December 2009

Impact Assessments:

Risk Management
The report sets out some of the key areas of financial risk to the authority. At this time the Council is well placed to meet such challenges, although if the necessary savings highlighted are not actively pursued problems will arise in the medium term.

Equality and Diversity:

No assessment undertaken.

Did the initial assessment of the proposals contained in this report for relevance to the Council's general equality duties, reveal any potentially adverse equality implications?

Where equality implications were identified through the initial assessment process, has a formal Equality Impact Assessment been undertaken?

What equality implications were identified through the Equality Impact Assessment process?

How have the equality implications identified through the Equality Impact Assessment been addressed in this report in order to avoid discrimination against any particular group?