

Fairness and Equalities Impact Assessment (FEIA)

This is an integrated Impact Assessment which aims to ensure Newport City Council makes decisions which are fair, take account of relevant evidence, and seek to secure the best outcomes for our communities. **An FEIA should be used to inform the first steps of decision-making, at concept stage, not when a decision is already made, or at the point when it cannot be influenced.** This impact assessment considers our legislative responsibilities under:

- The Equality Act (2010), including the Socio-economic Duty
- The Wellbeing of Future Generations (Wales) Act (2015)
- The Welsh Language (Wales) Measure (2011)

The FEIA process is not intended to prevent decisions being made, but to ensure we have considered their potential impact. An FEIA also helps us to focus on how we can reduce any negative impacts and provides us with evidence that we have met our legal duties.

For support to complete your FEIA, please contact the [Equalities Team](#)

What do we mean by Fairness?

The Newport Fairness Commission is an independent body which advises the council on the best use of resources and powers to achieve the fairest outcomes for local people. The Fairness Commission has established four **Principles of Fairness** which should be considered as part of any decisions that the council make – the questions below are useful to reflect on before you start your FEIA.

Equity	Are people being treated in a consistent way, whilst acknowledging their differences (for example, need, barriers to accessing services)?
	Will the gap between those with more, and those with less be reduced?
	Have the interests of different groups affected (including minority or disadvantaged communities) been taken into account?
Priority	Have the needs of the most disadvantaged and vulnerable across the city been given priority?
	Have you considered possible indirect consequences for minority/disadvantaged communities when other priorities are directing decisions?
Inclusion	Will the voices of all those affected by your decision be heard?
	Are people able to participate in and shape a service, as well as receiving it?
	Have you considered the impact of your decision on the relationship between communities, and the spaces they share?
Communication	Are decisions being made transparently and consistently?
	How will decisions be communicated to people who are affected in a clear way, with the opportunity for feedback?

Part 1: Identification

Name of person completing the FEIA	Lucy Paterson
Role of person completing the FEIA	Waste and Cleansing Service Manager
Date of completion	05/12/2022
Head of Service who has approved this FEIA	Silvia Gonzalez-Lopez

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

- New or revised policies, practices or procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year and strategic financial planning
- Decisions affecting service users, employees or the wider community including (de)commissioning or revising services
- New project proposals affecting staff, communities or access to the built environment
- Public events
- Local implementation of National Strategy/Plans/Legislation
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Service Boards
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other *please explain in the box below:*

2. Please describe the overall aims, objectives and intended outcomes of your decision

Household waste recycling centres (HWRC) need to accept household waste free of charge, as costs of collecting, recycling and disposing of household waste are covered via Council tax. The Council however, and although not required to, accepts other types of waste such as DIY and construction materials as they can be commonly produced by residents. This supposes an extra cost so the proposal is to introduce a small charge to offset the costs of handling and recycling rubble and plasterboard waste and tyres.

3. Who are the main stakeholders who may be impacted by your decision and what data do you hold on them? Consider communities of place (people who live in the same geographic area) and communities of interest (people who share particular characteristics but may live in different geographic areas). Stakeholders may include residents, local businesses, community groups, staff or partners.

Newport's HWRC is only open to Newport residents (use by residents from other Local Authorities or by businesses is now allowed), so main stakeholders affected by the proposal are the Newport residents who make use of the HWRC to dispose of these types of materials.

Part 2: Engagement

When completing this section, you need to consider whether you have sufficient information about the views and experiences of people who your decision will impact upon. If you don't, you may need to undertake a period of engagement/consultation before continuing. An FEIA is a live document, so can be updated with consultation findings, and amended as needed during the decision-making process.

The council has a duty to consult and engage with people who may experience inequalities as a result of your decision. This includes people **who share Protected Characteristics** (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who **have lived experience of socio-economic disadvantage**. The council's Youth Promise also requires us to ensure **all young people in Newport are listened to and included in decisions affecting them**.

The council also has a duty to ensure that any consultation is available bilingually (in Welsh as well as English), and you may like to consider any other community languages that are spoken by people who may be impacted by your decision. Below are some questions that should be included in any public consultation relating to a decision which may impact on the use of Welsh language in Newport:

1. Do you believe that the proposed decision/policy will have a positive or negative effect on opportunities to use the Welsh language?
2. If you think it will have a negative effect, what steps could we take to lessen or remove this and improve positive effects?
3. Do you believe that the proposed decision/policy will treat the Welsh language less favourably than the English language?

1. How have you engaged with people who may be affected by your decision (the stakeholders you have identified)?

Public engagement was undertaken following Newport City Council Cabinet's agreement of budget proposals as a basis for consultation. This process took two forms: an online public-wide SNAP survey for all citizens and a shortened survey accessible to free bus Wi-Fi users. The opportunity to contribute to the consultation was advertised across various social media platforms (in both Welsh and English). In addition, it was promoted on the landing page of the council website for ease of access.

The main aim of this consultation was to capture the views and opinions of Newport residents on the draft budget and medium-term financial plan, particularly their thoughts on each budget-saving proposal. The consultation ran from 15 December 2022 until 02 February 2023. 1,473 responses were received, including 820 through the online consultation survey and 653 through the bus Wi-Fi survey. The feedback received is reflected in this FEIA and will be considered by Cabinet before agreement on final budget savings proposals (see Table 1).

Table 1: Budget consultation 2023/24 Timetable

Cabinet agrees budget proposals as a basis for consultation	14 December 2022
Consultation Period	14 December 2022 to 2 February 2023
Cabinet considers feedback from consultation and agrees final budget proposals and recommends resulting overall budget and council tax required to full Council	15 February 2023
Council approves the 2022/23 overall budget and resulting council tax level required	28 February 2023

2. What do you know about the views or experiences of people who may be affected by your decision?

There is statistic information on service usage – i.e. number of HRWC visits, tonnage of the different waste streams collected etc. There will also be information available on any complaint/comment received from residents on the service.

Consultation findings

820 responses were received through the online public-wide SNAP survey. This survey specifically asked respondents:

- What they think the Council should do with this saving proposal
- How important is protecting funding for this service compared to other services in the Council's budget savings proposal; and
- Any other comments about this savings proposal.

Key findings from the SNAP survey indicated that:

- 58.33 % agreed with the Council making the full budget saving.
- 8.33 % agreed with the Council making a smaller budget saving
- 28.43 % felt the Council should avoid making any budget savings for this service
- 4.90 % of respondents were unsure what the Council should do with this savings proposal

The key element highlighted as part of the comments collated during consultation is a worry that the proposal may lead to increased flytipping and increased costs for the Council to deal with it as a result. This element had been considered when considering options linked to this proposal and some information has been included in the 'Actions and outcomes' section of this assessment.

A separate consultation summary which incorporates more detailed feedback on the consultation outcome is available and can be consulted separately.

Demographics of SNAP survey

- 55% of respondents were female, 38% were male, 1% were non-binary 7% preferred not to disclose their gender.
- The majority (29%) of respondents were aged between 35 – 44 years of age; this age group and the 45 – 54 category (23%) account for 52% of all respondents. The rest were aged between 18- 24 years old (3%), 25-34 years old (16%), 55-65 years old (15%), 65-74 years old and 75 (2%) years old.
- The majority (87%) of respondents came from White: English, Welsh, Scottish, Northern Irish or British backgrounds (*see Table 3*).
- 12% of respondents identified as disabled, with 9% preferring not to provide information
- 2% of respondents stated they were Welsh speakers.
- The majority (62%) of respondents had children of school age and 16% had children of pre-school age.
- 6% of respondents identified as LGBTQ+, 78% identified as straight/heterosexual and 16% preferred not to say
- 2% of respondents indicated that their gender identity was different from their sex registered at birth.

Part 3: Assessment

This section requires you to assess the potential impact of your decision on a range of groups who may experience specific disadvantages. Your assessment should be supported by evidence – either from your own engagement/consultation, similar or previous engagement, what you already know about the people who access your service, or from local and national sources of information.

Useful documents which set out information about how communities are impacted by inequalities include [EHRC – Is Wales Fairer?](#) and the council's [COVID-19 Community Impact Assessment](#). Your decision may have both positive and negative impacts – if this is the case, please place a cross in both boxes.

1. Impact on people that share Protected Characteristics

[Protected Characteristics](#) are defined under the Equality Act 2010, and describe groups of people who are protected from discrimination, either in the workplace, or through the provision of goods and services. The council must consider how decisions may impact on people differently because of a protected characteristic, and how any negative impact could be reduced. National guidance on assessing equality impacts and the Public Sector Equality Duty can be found [here](#). You can also access further advice and examples of positive and negative impacts [here](#).

Protected characteristic	Impact:			<p>Provide further details about the nature of the impact in the sections below, considering the Public Sector Equality Duty that the council has to:</p> <ol style="list-style-type: none"> 1. Promote equal opportunity across different groups 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation
	Positive	Negative	Neither	
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.

Protected characteristic	Impact:			<p>Provide further details about the nature of the impact in the sections below, considering the Public Sector Equality Duty that the council has to:</p> <ol style="list-style-type: none"> 1. Promote equal opportunity across different groups 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation
	Positive	Negative	Neither	
Marriage or civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.
Pregnancy or maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.
Religion or Belief or non-belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget proposal will positively or negatively impact people who share this protected characteristic.

2. Impact on Welsh Language

The Welsh Language (Wales) Measure specifies that for all policy decisions, the council must consider the effects (both positive and negative) on the Welsh language. For further guidance on Welsh language considerations see [here](#).




	Impact:			
	Positive	Negative	Neither	
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed budget investments will positively or negatively impact the Welsh Language or compliance to Welsh Language Standards



1. Please describe how you have ensured your engagement has considered the view of Welsh speakers in Newport and the impact of your decision on the Welsh language.

All consultation supporting documents, information and surveys were available equally in Welsh, either through our website, social media or upon request of paper/alternative formats. The same applies for all comms material to be issued to inform residents about the changes to the waste collection services. The consultation was advertised bilingually, and participants were given the option to read and complete this in either Welsh or English. Welsh speakers made up 2% of those participating the online public-wide SNAP survey.

3. The Sustainable Development Principle

The Well-being of Future Generations Act puts in place a sustainable development principle which helps organisations consider the impact they could have on people living in Wales in the future, and ensure they are focused on tackling long-term challenges. Below, consider how your decision promotes, advances, or contradicts the [5 ways of working](#) which underpin the sustainable development principle. You can access further guidance on considering the sustainable development principle [here](#).

<p>Long term</p> 	<p><i>The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.</i></p>	<p>At present the Council’s HWRC accepts rubble, plasterboard and tyres despite these materials falling outside the definition of household waste, providing an easy and accessible alternative to private collections by commercial operators. Those collections may not only result more costly but also suppose additional requirements such as residents having to ensure proper duty of care when handling that waste, or else they could be liable to a fine. By introducing a small charge to cover the extra costs generated by these types of waste, the service area will ensure the service can be maintained longer term.</p>
<p>Prevention</p> 	<p><i>Putting resources into preventing problems occurring or getting worse</i></p>	<p>The measure protects the current service and prevents issues such as residents being at risk of breaches of duties of care and potential negative consequences linked to that. By ensuring the waste can still be collected by the Council it ensures there is a viable, easy and cheap alternative to residents and will prevent instances of flytipping</p>
<p>Integration</p> 	<p><i>Considering how the public body’s well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.</i></p>	<p>All HWRC materials are recycled using local companies, which contributes to a circular economy and works towards the well-being goals. This proposal helps maintain the range of materials collected and recycled via our HWRC, which has an overall positive impact on a healthier and more prosperous Wales.</p>

<p>Collaboration</p> 	<p><i>Working together to deliver objectives.</i></p>	<p>The Council is committed to recycling, with set targets for its HWRC as part of the wider waste strategy, and will always maximise opportunities to divert waste from landfill. By keeping a wider range of materials being collected we are adding resilience to the site, which is also used as platform for other reuse and recycling initiatives with third sector partners.</p>
<p>Involvement</p> 	<p><i>Involving those with an interest and seeking their view - ensuring that those people reflect the diversity of the area.</i></p>	<p>Main stakeholders will be Newport's residents and, as stated above, the proposal will be subject to public consultation.</p>

4. Socio-economic Duty

The [Socio-economic Duty](#) is set out in the Equality Act 2010, and requires the council, when making strategic decisions, to pay due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage. Inequalities of outcome are felt most acutely in areas such as health, education, work, living standards, justice and personal security, and participation.

A 'strategic decision' is defined by Welsh Government as a decision **which affects how the council fulfils its statutory purpose over a significant period of time and does not include routine 'day to day' decisions**. Strategic decisions include:

- Corporate plans
- Setting wellbeing, equality and other strategic objectives
- Changes to, or development of public services
- Strategic financial planning
- Strategic policy development

If you do not think your decision meets this definition, and you do not plan on carrying out a Socio-economic Duty Assessment in this section, please provide your rationale below. Any decision which is presented to a Cabinet Member, at Cabinet or Council will be viewed as a strategic decision.

The proposed change to introduce charges for certain waste streams does not change the overall service provision or impacts on statutory delivery, and it does not meet the definition of a 'strategic decision'.

If your decision does meet the definition, please consider the impact of your decision on the socio-economically disadvantaged groups, and areas of inequality that may arise from socio-economic disadvantage contained in the matrix below. The groups listed are not exhaustive and you should consider any additional groups relevant to your decision who may experience socio-economic disadvantage in the following ways:

- **Low Income/Income Poverty** - cannot afford to maintain regular payments such as bills, food, clothing, transport etc.
- **Low and/or no Wealth** - enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future
- **Material Deprivation** - unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)
- **Area Deprivation** - where you live (rural areas), where you work (accessibility of public transport)
- **Socio-economic Background** – for example, parents' education, employment and income

Indicate a positive or negative impact, or both where they apply, and the severity of this impact by coding the sections of the grid based on the below. *If there is no/neutral impact, please leave blank.*

Negative Impact		Positive Impact	
N1	Negative impact – mild	P1	Positive impact – mild
N2	Negative impact – moderate	P2	Positive impact – moderate
N3	Negative impact – significant	P3	Positive impact – significant
N4	Potential for negative impact (but unsure)	P4	Potential for positive impact (but unsure)

Areas of inequality that may arise from socio-economic disadvantage – definitions							
Education :The capability to be knowledgeable, to understand and reason, and to have the skills and opportunity to participate in the labour market and in society							
Work : The capability to work in just and favourable conditions, to have the value of your work recognised, even if unpaid, to not be prevented from working and to be free from slavery, forced labour and other forms of exploitation							
Living Standards : The capability to enjoy a comfortable standard of living, in appropriate housing, with independence and security, and to be cared for and supported when necessary.							
Justice, Personal Security and Community Safety : The capability to avoid premature mortality, live in security, and knowing you will be protected and treated fairly by the law							
Health : The capability to be healthy, physically and mentally, being free in matters of sexual relationships and reproduction, and having autonomy over care and treatment and being cared for in the final stages of your life							
Participation : The capability to participate in decision making and in communities, access services, know your privacy will be respected, and express yourself							
Areas of inequality							
Groups	Living Standards	Work	Health	Education	Justice and community safety	Participation	Physical Environment
Children living in poverty							
Low income households without dependent children							
Unemployed young people							
Long term unemployed							
Homeless households							
Refugees, migrants and asylum seekers							
Deprived neighbourhoods - WIMD rank in 10% most deprived LSOA							

People on Universal Credit / income related benefits							
Adults with no qualifications or low qualifications							
People living in low quality housing or in Houses of Multiple Occupation							

1. What evidence do you have about socioeconomic disadvantage and inequalities of outcome in relation to this decision?

2. Please describe how you have ensured your engagement has considered the views of people living in Newport who are affected by socio-economic disadvantage.

3. Does this decision contribute to a cumulative impact?

Part 3: Actions and Outcomes

Considering any negative impacts that you have identified, indicate below how you will reduce these, increase the potential for positive impacts, and how you will monitor those impacts. Further guidance on how to complete your action plan can be found [here](#).

IMPACT ON PEOPLE THAT SHARE PROTECTED CHARACTERISTICS			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
None identified			
IMPACT ON WELSH LANGUAGE			

Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
No negative impact identified			
SOCIO-ECONOMIC IMPACTS			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
N/A			
SUSTAINABLE DEVELOPMENT PRINCIPLE			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
<p>Proposal helps offset existing costs and protect current service, which has a positive impact on recycling and contributes to the circular economy.</p> <p>However as part of consultation with the public, concern about the proposal potentially leading to an increase in flytipping has been raised.</p>	<p>The proposal to introduce charges for certain waste streams enables the Council to move away from the option to stop collecting those waste streams if it cannot afford the cost. This will therefore ensure that collection of those items via recycling centre continues being viable. This in itself would prevent issues regarding potential increase of flytipping/breaches of duty of care if residents didn't have an outlet to take items such as rubble, tyres or plasterboard.</p> <p>Information available to date does not show a correlation between changes to the operation of HWRCs and increases in flytipping, and similar charges have been implemented by other Local Authorities without reports of increased flytipping. Flytipping is an illegal activity and any resident caught flytipping will be subject to a fine or prosecution. The Council has a waste enforcement team to deal with flytipped waste and enforcement action, and reports from residents for flytipping incidents are encouraged. The Council employs a range of tools from proactive patrols to CCTV and searches to deal with flytipping and this activity will continue to be in place without changes.</p> <p>The Council's proposal includes prices that are below average of what other LAs charge, where average charges for rubble are £2/30kg bag or higher, and tyres £4-5 per unit.</p>	<p>The number of flytipping incidents and type of waste flytipped gets monitored on an annual basis by the regulator.</p> <p>Tonnage of the different types of waste collected at the household waste recycling centre gets recorded and monitored on a quarterly and annual basis.</p>	

Once your FEIA is complete, please forward to ncequality@newport.gov.uk