

# 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.

<b>Equity</b>	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?
<b>Priority</b>	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?
<b>Inclusion</b>	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?
<b>Communication</b>	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	Sarah Morgan
Role of person completing the FEIA	<b>Chief Education Officer</b>
Date of completion	<b>February 10<sup>th</sup> 2023</b>
Head of Service who has approved this FEIA	<b>As above</b>

### 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**

This is a proposal to provide a 10% reduction in funding to SENCOM regional partnership (Sensory Communication Team). The total budget from all local authorities across the region is currently £2.43 million. At present Newport City Council provides £651,025 per year. This proposal will maintain a £585,922 contribution on an annual basis. It is recognised that around 13% of SENCOM costs are linked to non-staffing costs and accommodation. Newport City Council can offer support with alternative accommodation within the city for elements of the SENCOM service if required.

**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.**

The main stakeholders who may be impacted by this proposal are:

- SENCOM staff
- SENCOM service users (children, young people and their families).
- Schools
- Learners with Additional Learning Needs, in particular those individuals which have sensory impairments, hearing impairments or visual impairments.

## 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?**

In March 2020, a report on the SENCOM Review was published. This report demonstrated that many stakeholders wanted the regional partnership to continue. This proposal retains the partnership position. The report recommended increasing the accessibility of the service in each local authority. Using a Newport City Council building to support the SENCOM service would support service users' views.

The report recommended reducing staff travel time to provide a more effective service – this may also support service users to receive a more efficient 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.

Q12a: What do you think the council should do with this saving proposal?

Reduction in core contributions to SenCom	No. of people	% of people
<b>A: Make the full budget saving</b>	214	36.96%
<b>B: Make a smaller budget saving</b>	126	21.76%
<b>C: Avoid making any budget savings for this service</b>	181	31.26%
<b>D: Not sure</b>	58	10.02%

NB: There were 241 no responses.

Q12b: How important is protecting funding for this service compared to other services in the council's budget savings proposals for 2023/24?

	No. of people	% of people
<b>1 of most importance</b>	118	22.52%
<b>2</b>	128	24.43%
<b>3</b>	149	28.44%
<b>4</b>	54	10.31%
<b>5 of least importance</b>	75	14.31%

NB: There were 296 no responses.

A selection of comments, in the respondent's own words, that indicate the range of responses received:

- Sensory impairments are a serious issue, and the value of savings are not proportionate to the impact.
- If savings can be made without impacting on services such as using council accommodation that should be prioritised.
- The building is vital to the service. It not only houses staff, but equipment and vital support groups that provide mental health support. There doesn't exist other facilities in each local authority that could house the equipment needed as well

as the resources and groups. Cost savings could be made by reducing visits and offering training instead thus reducing travel costs, producing and sending resources, providing training at the university creating an advisory service instead of providing education which staff could do from office / home.

- Try to encourage saving through the use of council owned assets.
- If it can be achieved through overhead reductions, then fine.
- This service is vital for people with sensory and communication difficulties. Helping children with visual impairment from a young age benefits them throughout their school life. Helping them to achieve the best education possible means they have better outcomes in life.

## 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><b>Provide further details about the nature of the impact in the sections below, considering the Public Sector Equality Duty that the council has to:</b></p> <ol style="list-style-type: none"> <li>Promote equal opportunity across different groups</li> <li>Promote community cohesion</li> <li>Help eliminate unlawful discrimination/ harassment/ victimisation</li> </ol>
	Positive	Negative	Neither	
<b>Age</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The reduction in funding contributions will be linked to children and young people primarily. It is possible that if efficiencies are non-staff related and savings area made by using local council assets no negative impact will occur. If staffing efficiencies have to be made, this will be a negative impact.
<b>Disability</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>SENCOM serves clients with sensory, hearing and visual impairments. The reduction in funding contributions will be linked to service users with disabilities.</p> <p>It is possible that if efficiencies are non-staff related and savings area made by using local council assets no negative impact will occur. If staffing efficiencies have to be made, this will may result in negative impact as less professional</p>

Protected characteristic	Impact:			<p><b>Provide further details about the nature of the impact in the sections below, considering the Public Sector Equality Duty that the council has to:</b></p> <ol style="list-style-type: none"> <li>1. Promote equal opportunity across different groups</li> <li>2. Promote community cohesion</li> <li>3. Help eliminate unlawful discrimination/ harassment/ victimisation</li> </ol>
	Positive	Negative	Neither	
				support may be available, although given the relatively small proportion of the budget reduction, the vast majority of the service will remain.
<b>Gender Reassignment</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed Budget savings will positively or negatively impact people who share this protected characteristic.
<b>Marriage or civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed Budget savings will positively or negatively impact people who share this protected characteristic.
<b>Pregnancy or maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed Budget savings will positively or negatively impact people who share this protected characteristic.
<b>Race</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed Budget savings will positively or negatively impact people who share this protected characteristic.
<b>Religion or Belief or non-belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed Budget savings will positively or negatively impact people who share this protected characteristic.
<b>Sex</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed Budget savings will positively or negatively impact people who share this protected characteristic.

Protected characteristic	Impact:			Provide further details about the nature of the impact in the sections below, considering the Public Sector Equality Duty that the council has to:  <ol style="list-style-type: none"> <li>Promote equal opportunity across different groups</li> <li>Promote community cohesion</li> <li>Help eliminate unlawful discrimination/ harassment/ victimisation</li> </ol>
	Positive	Negative	Neither	
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposed Budget savings 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	
<b>Welsh Language</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If the funding reduction impacts on staffing, this may reduce staffing with the ability to speak Welsh or the ability to recruit new staff who speak Welsh

**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 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>The Council must achieve a balanced budget and maintain the best service for its customers. Customers are wider than those in schools alone. This budget proposal prevents a further, disproportionate funding reduction to wider Council services.</p> <p>There are risks around the long term impact of the children if the Council and schools do not provide the support they require, especially if school funding levels continue to reduce. This may have an impact on their attendance, exam results, employability and wellbeing.</p>
<p>Prevention</p> 	<p><i>Putting resources into preventing problems occurring or getting worse</i></p>	<p>All partners are facing financial challenges. As responsible partners we have a duty to ensure that funding challenges are balanced and proportionate. The continued £585, 922 annual investment will support the service to continue.</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><b><u>Wales' Well-being Goals</u></b>  <b>This proposal supports the following wellbeing goals:</b></p> <ul style="list-style-type: none"> <li>• <i>A resilient Wales: As councils work together to continue to support regional partnership working.</i></li> <li>• <i>A healthier Wales: As the council will continue to invest in SENCOM to support the health needs of children and young people.</i></li> </ul>

		<ul style="list-style-type: none"> <li>• <i>A more equal Wales: As the council continues to ensure that children and young people with protected characteristics (ALN needs) continue to receive a service,</i></li> <li>• <i>A Wales of more cohesive communities: The continuation of SENCOM with a £585, 922 annual contribution allows the service to work with clusters of schools and support communities with their sensory needs.</i></li> </ul>
<p>Collaboration</p> 	<p><i>Working together to deliver objectives.</i></p>	<p>Collaboration across the region will remain in place and secure SENCOM services. SENCO will also continue to work with all regional schools and Inclusion Services to ensure that service users will be supported.</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>Public engagement was undertaken following Newport City Council Cabinet's agreement of budget proposals as a basis for consultation. This proposal was included as part of the public consultation pack. The main aim of this consultation was to involve and capture the views of all residents, including those who share protected characteristics, are affected by socio-economic disadvantage and are the most vulnerable to the impact of savings proposals</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.

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
<b>Education</b> :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
<b>Work</b> : 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
<b>Living Standards</b> : 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.
<b>Justice, Personal Security and Community Safety</b> : The capability to avoid premature mortality, live in security, and knowing you will be protected and treated fairly by the law
<b>Health</b> : 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
<b>Participation</b> : The capability to participate in decision making and in communities, access services, know your privacy will be respected, and express yourself

Groups	Areas of inequality						
	Living Standards	Work	Health	Education	Justice and community safety	Participation	Physical Environment
Children living in poverty				N1 P2			
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?**

Within any large group of children and young people, there will be service users who are experiencing poverty. Pupils from disadvantaged backgrounds can be diagnosed with an additional learning needs much later in life due to limited attendance in schools and less frequent visits to see health professionals. If staffing is reduced in SENCOM, this marginal cut could disadvantage this already disadvantaged group. However if efficiencies are made to use local buildings to house SENCOM staff or therapies, this will support poverty as this will allow cheaper travel options.

**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.**

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. This engagement captured the views and opinions of a wide range of people, including people living in areas of Newport ranked within 10% most deprived in Wales by the WIMD, who are likely to be affected by socio-economic disadvantage.

**3. Does this decision contribute to a cumulative impact?**

This savings proposal is part of a series of council decisions around budget savings that may contribute to a cumulative impact. Residents often access more than one service so as savings proposals are spread across a number of areas it is highly likely there will be a cumulative impact on individuals and families affected by socio-economic disadvantage.

The Council will review the cumulative impact of this decision in relation to all budget savings proposals following Cabinet's agreement of the final budget proposals for 2023 -24. As part of our FEIA process, we will continue to monitor the impact of this budget savings proposal,

including any potential impacts identified at this stage, actual impacts if implemented and the potential cumulative impact. This document will be reviewed and may be updated to reflect any changes

## 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
Potential reduction in service to pupils with ALN	The local authority will continue to support Professional Learning for teachers to ensure that we build capacity within the classroom. This will allow SENCO staff to support pupils most in need of specialist services.	The local authority will monitor the number of service users supported in each SENCOM tier of need.	Katy Rees Assistant Head of Education for Inclusion
IMPACT ON WELSH LANGUAGE			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
Potential risk to the number of Welsh Speakers within the service	All public services must consider advertising for Welsh Speaking staff	The LA will monitor the ability for SENCOM to provide its services in Welsh.	Katy Rees Assistant Head of Education for Inclusion
SOCIO-ECONOMIC IMPACTS			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner

Potential for SENCOM to use local council buildings for staff and therapies	The LA will work with SENCOM to identify these opportunities, therefore saving high cost rentals and ensuring easier access to service users with limited transport budgets.	Through regular regional meetings	Katy Rees Assistant Head of Education for Inclusion
<b>SUSTAINABLE DEVELOPMENT PRINCIPLE</b>			
<b>Summary of impact</b>	<b>Action to reduce negative impact / opportunities to increase positive impacts</b>	<b>How this impact will be monitored</b>	<b>Owner</b>
N/A			

Once your FEIA is complete, please forward to [nccequality@newport.gov.uk](mailto:nccequality@newport.gov.uk)