

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	Kath Bevan
Role of person completing the FEIA	Assistant Head of Education
Date of completion	2/12/22
Head of Service who has approved this FEIA	Sarah Morgan

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

To reduce LA core contributions to the Educational Achievement Service (Regional School Improvement Service). The EAS provides an equitable School Improvement Service at all local authorities in the region (Newport, Torfaen, Caerphilly, Monmouthshire, and Blaenau Gwent).

Recommended core contributions were established as part of Welsh Government directed reforms in 2012. These are proportionate to the size and population of each individual local authority. Currently Newport pays £790k for 2022-23. This proposal is to reduce this core contribution by 20% in 2023/24.

This reduction is the first of its kind and further regional partnership work needs to be explored to find out the specific outcome. In a scenarios this would result in a reduction in the support of EAS School Improvement work for Newport's 57 schools.

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.

This FEIA has been informed using:

- The requirement to make savings with the Education Service
- Nearly all schools using Grants from Welsh Government to fund some aspects of professional learning
- Feedback from Headteachers

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)?

Discussions with the senior leadership team of the EAS in a timely manner to provide the leaders time to plan the service they will be able to offer with the budget costs considered.

There are 57 schools across Newport, all leaders will be consulted.

Regular updates will be provided to Headteachers via the Chair of CONSHE (Conference of Newport Secondary Heads) and the Chair of NAPHS (Newport Association of Primary Heads)

Regular conversations between Chief Education Officer, Deputy Chief Education Officer, Head of Engagement and Learning, Head of ALN and Inclusion and the Service Manager for Resources and Planning

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

Initial scenarios have been discussed with the Regional Improvement Service to prepare them as they will need to possible realign their future offer of work to be financially viable.

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"/>	Linked to children and young people of school age. School leaders will continue to access PL and support for school improvement activities.
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The additional learning needs of children and young people remains an LA function, therefore this support will remain the same.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This proposal does not specifically affect this protected characteristic in a disproportionate way, although it is recognised that any vulnerable group can become more vulnerable when any change in service is made

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"/>	It is not anticipated that this proposal will have any impact, positively or negatively, on this protected characteristic as staff are employed directly by the EAS.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>This proposal does not specifically affect this protected characteristic in a disproportionate way, although it is recognised that any vulnerable group can become more vulnerable when any change in service is made. School leaders will continue to access support from:</p> <ul style="list-style-type: none"> • Education Service Team • GEMS (Gwent Education Minority-Ethnic Service) • National DARPL Service
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 savings 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.

This proposal will be part of the wider Council engagement and consultation. The views of Welsh speakers and the impact of decision on the Welsh Language will be part of that process.

Headteachers are meeting with Welsh Medium Headteachers

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. This budget proposal prevents a further, disproportionate funding reduction to wider Council services. The Regional School Improvement Service will still access funding to provide the education statutory elements.</p>
<p>Prevention</p> 	<p><i>Putting resources into preventing problems occurring or getting worse</i></p>	<p>Discussion with the Regional School Improvement Service will need to include:</p> <ul style="list-style-type: none"> • Schools with the highest levels of need will be prioritised for support. • Schools which appear to be working well will have less resource allocation. This is a risk as without school collaboration and regular communication, the local authority may be unaware of an issue which causes concern until a school is externally inspected by Estyn (at which point a school may go into an Estyn statutory category).
<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>A prosperous Wales Enabling children to continue to access education will support their progress into employment, education, or training on leaving school.</p>

		<p>A resilient Wales This proposal demonstrates the flexibility and creativity of schools in Wales, by looking to establish opportunities of supporting each other's school improvement journey.</p> <p>A healthier Wales This proposal maximises opportunities of Local Authority Services by maintaining the Healthy School Officers role to ensure health and wellbeing continue to be on every school's agenda.</p> <p>A more equal Wales This proposal looks to ensure that all learners in Newport, can thrive within their learning organisation.</p> <p>A Wales of more cohesive communities This proposal allows schools to remain safe and respectful learning organisations.</p> <p>A Wales of vibrant culture and thriving Welsh Language This proposal will not have a negative impact on Welsh Language.</p> <p>A globally responsible Wales This proposal demonstrates the careful decision making that has least impact on children and young people, thus continuing to enable children and young people to thrive in their learning organisations</p>
<p>Collaboration</p> 	<p><i>Working together to deliver objectives.</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. School leaders work effectively with grants to drive school improvement. Some elements of service from the Regional School Improvement Service may have to be picked up by Local Authority Officers.</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>Chief Education Officer has started discussion with the Regional School Improvement Service and other Chief Education Officers in neighbouring authorities.</p>
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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.

This document provides evidence that due regard to the need to reduce the inequalities from socio-disadvantage has been considered.

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							
Groups	Areas of inequality						
	Living Standards	Work	Health	Education	Justice and community safety	Participation	Physical Environment
Children living in poverty				N1			
Low income households without dependent children				N1			
Unemployed young people				N4			

Long term unemployed				N4			
Homeless households				N4			
Refugees, migrants and asylum seekers				N4			
Deprived neighbourhoods - WIMD rank in 10% most deprived LSOA				N4			
People on Universal Credit / income related benefits				N1			
Adults with no qualifications or low qualifications				N4			
People living in low quality housing or in Houses of Multiple Occupation				N4			

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

As this document addresses the Councils of using core budget to provide a School Improvement Service there should not be any direct impact upon children and young people disadvantaged by socio economic inequalities as schools will continue to have their Pupil Development Grant as this is an additional grant provided by Welsh Government.

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.

All Headteachers from across the City of Newport are representatives of their community population and will be fully consulted in this proposal.

3. Does this decision contribute to a cumulative impact?

Schools with the highest levels of need will be prioritised for support. Schools which appear to be working well may only receive the statutory elements that the school improvement service provides.

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
No direct negative impact			
IMPACT ON WELSH LANGUAGE			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
Welsh Language	Welsh-medium schools rely on immersion for language learning, where children practice Welsh in all areas of the school not just in a classroom setting. 98% of children in Welsh-medium schools in Newport come from non-Welsh speaking families. Across Newport the Welsh Medium Schools work collaboratively and meet as a cluster of schools. Elements of this professional relationship are Headteachers working together on school improvement activities. The Local Authority remains to have their WESP Plan to ensure Welsh Language is not adversely impacted.	ESMT attends WM Cluster Meetings and impact will be captured via feedback from Headteachers.	
SOCIO-ECONOMIC IMPACTS			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner

It is not anticipated that this proposal will have any impact, positively or negatively, on this protected characteristic as staff are employed directly by the EAS.			
SUSTAINABLE DEVELOPMENT PRINCIPLE			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
Bespoke support to each school or setting, aligned to their school improvement needs.	Schools with the highest levels of need will be prioritised for support. Schools which appear to be working well may only receive the statutory elements that the school improvement service provides	This action will be monitored by: <ul style="list-style-type: none"> • Regular HT feedback • Regular Professional Partnership meetings between NCC and EAS • School Development Plans • School Grant Plans 	EAS
Partner school improvement activities may not always have regional school improvement representation	This is a risk as without school collaboration and regular communication, the local authority may be unaware of an issue which causes concern until a school is externally inspected by Estyn (at which point a school may go into an Estyn statutory category.). Therefore, the LA will encourage Headteachers to work collaboratively with LA Officers.	This action will be monitored by: <ul style="list-style-type: none"> • Regular HT feedback • Regular Professional Partnership meetings between NCC and EAS • School Development Plans • School Grant Plans 	Deputy Chief Education Officer
Headteacher's Performance Management	As this is a statutory function of the Regional School Improvement Service, it is anticipated this function will still be available.	Regular Professional Partnership meetings between NCC and EAS	Chief Education Officer and

			Deputy Chief Education Officer
Support and direction on the development of Curriculum for Wales design including vision, curriculum content, professional learning, assessment, and progression steps	The Regional Improvement Service supported schools to plan for the implementation of Curriculum for Wales, encouraging wherever possible a cluster approach to working. This approach has developed sustainability across the LA as schools continue to work collaboratively on delivery of Curriculum for Wales and share their practice with each other. Education Senior Leaders attend all cluster meetings across the city and therefore will remain informed on how schools are progressing with this work.	This action will be monitored by: <ul style="list-style-type: none"> • Regular HT feedback • Regular Professional Partnership meetings between NCC and EAS • School Development Plans • School Grant Plans 	Deputy Chief Education Officer
An all-encompassing approach to professional learning of the education workforce (leadership, teaching and learning, subject expertise, support for vulnerable & disadvantaged groups, School as Learning Organisations in primary, secondary, post 16, maintained / non maintained early years settings and pupil referral units.	At this time, it is unclear what professional learning will be available from the Regional School Improvement Service. However, many programmes have been designed on a national basis and access to those sessions should still be available. Progress of Disadvantaged and Vulnerable Groups of learners will continue to be monitored by two Assistant Heads of Education within Newport. SEREN Network supporting learners in Post 16, is an additional service directly funded by Welsh Government, therefore secondary schools will still have access to this provision.	<ul style="list-style-type: none"> • Attendance of ESMT to Cluster Headteacher meeting. • Newport Post 16 Strategy Group • Cluster Inclusion Meetings 	Assistant Head of Education – Engagement and Learning. Assistant Head of Education – ALN and Inclusion
Support for schools and settings to reach the aims and objectives of Welsh Government	Welsh Government Education Policy and Vision aims, and objectives are embedded into the Newport Education Service Plan. This plan is continually evaluated to ensure it aligns with WG updated policies.	This action will be monitored by: <ul style="list-style-type: none"> • Regular HT feedback 	Education Senior Management Team

Education Policy and vision.		<ul style="list-style-type: none"> • Regular Professional Partnership meetings between NCC and EAS • School Development Plans 	
Learning Networks and collaborative links to develop high quality school to school good practice.	At this point in time, it is unclear of how the Regional School Improvement Service will operate with the budget cuts. However, as all schools are destined to become 'Self Improving Organisation' the sharing of practice is an embedded value of education across Newport.	<p>School Grant Plans</p> <p>This action will be monitored by:</p> <ul style="list-style-type: none"> • Regular HT feedback • Regular Professional Partnership meetings between NCC and EAS • School Development Plans • School Grant Plans 	Education Senior Management Team
Professional learning and support to all Governing Bodies.	Currently each school commits to a Service Level Agreement with the Regional School Improvement Service. It is unsure at this time what the future SLA will look like.	<ul style="list-style-type: none"> • Regular Professional Partnership meetings between NCC and EAS 	Education Senior Leader – Building and Governance.

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