

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	Jonathan Keen
Role of person completing the FEIA	Service Manager
Date of completion	1/12/22
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

This proposal implies a thorough review of the service delivered and the priority of interventions, together with a reduction in the hours that the service will remain operational, resulting in a redesign of the service, in order to deliver MTFP efficiencies for 2023-2024.

It does not propose to stop delivering most services, but it will involve delivering them in a different way. The service would no longer be delivered on a 7 day a week basis, which would imply that service requests received on certain days may not be responded to or have delayed response times.

Also, consideration would need to be given to potentially operating over fewer areas (based on evidence) and consideration of some categories of service requests that may need to be responded to differently, for instance potentially being diverted to partners such as police or registered social landlords, or other council services, depending on the nature of the request. For example, some types of service requests such as harassment, criminal activity, drug/solvent abuse and parking incidents would primarily have to be responded to by other partners, notably Gwent Police.

While there will be a change on the way services are delivered, this proposal will allow for the Community Service Warden service to remain operational and keep providing support to the Community and partners, while delivering efficiencies to help with the significant financial pressures the Council will have to face next year.

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 are members of the public and businesses who seek a service from the Community Safety Warden Service, and those who benefit from the work undertaken. Other stakeholders are partner organisations such as Gwent Police, Registered Social Landlords such as Newport City Homes, South Wales Fire & Rescue Service, Newport NOW BID.

The 2022 Community Well-being Profiles provide the following information in relation to Community Safety and anti-social behaviour, which are the factors that are the most relevant to the Community Safety Warden Service:

- In terms of Community Safety, Newport has 35.8% of the Lower Layer Super Output Areas (LSOAs) in the 10% most deprived in Wales.

- Within the Central community the LSOA's with the highest numbers of anti-social behaviour incidents from August 2018 to July 2021 were in Stow Hill 3 (943) and Stow Hill 1 (694). Across the Central community the number of anti-social behaviour incidents between August 2018 and July 2021 varied across each of its four wards ranging from Stow Hill (1,805); Pillgwenlly (1,553); Shaftesbury (752); and Allt-yr-yn (595).
- Within the North community the LSOA's with the highest numbers of anti-social behaviour incidents from August 2018 to July 2021 were in Bettws 5 (280) and Malpas 2 (241). Across the North community the number of anti-social behaviour incidents between August 2018 and July 2021 varies across each of its two wards ranging from Bettws (1,109) to Malpas (668).
- Within the North West community the LSOA's with the highest numbers of anti-social behaviour incidents from August 2018 to July 2021 were in Rogerstone 3 (202) and Rogerstone 4 (168). Across the North West community the number of anti-social behaviour incidents between August 2018 and July 2021 varied across each of its two wards ranging from Rogerstone (599) to Graig (406).
- Within the North East Community the LSOA's with the highest numbers of anti-social behaviour incidents from August 2018 to July 2021 were in Victoria 4 (628), St Julians 4 (382), Victoria 1 (337) and Victoria 3 (230). Across the North East Community the number of anti-social behaviour incidents between August 2018 and July 2021 varied across each of its four wards ranging from Victoria (1,416); St Julians (1,100); Beechwood (604); and Caerleon (569).
- Within the South West community the LSOA with the highest numbers of anti-social behaviour incidents from August 2018 to July 2021 were in Tredegar Park 1 (351). Across the South West community the number of anti-social behaviour incidents between August 2018 and July 2021 varied across each of its three wards ranging from Gaer (950); Tredegar Park (573); and Marshfield (502).
- Within the East Community the LSOA's with the highest numbers of anti-social behaviour incidents from August 2018 to July 2021 were in Ringland 2 (290), Alway 4 (295), Ringland 6 (309), Lliswerry 6 (321) and Lliswerry 5 (499). Across the East community the number of anti-social behaviour incidents between August 2018 and July 2021 varied across each of its five wards ranging from Lliswerry (1,787); Ringland (1,030); Alway (950); Llanwern (354); and Langstone (261).

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)?

This proposal is being issued for public consultation as part of the Budget proposals for 2023/2024; this report has been prepared in the pre-consultation stage and will be updated following consultation as required.

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

At this pre-consultation stage, views and experiences are not known. Information collated as part of the public consultation to be carried out in the period 14th December 2022 to 2nd February 2023 will help inform our views and will be taken into account when making a decision about this proposal.

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"/>	It is not thought that the proposed changes will positively or negatively impact people who share this protected characteristic.
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is not thought that the proposed changes will positively or negatively impact people who share this protected characteristic.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is not thought that the proposed changes 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"/>	It is not thought that the proposed changes 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 thought that the proposed changes will positively or negatively impact people who share this protected characteristic.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is not thought that the proposed changes 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"/>	It is not thought that the proposed changes will positively or negatively impact people who share this protected characteristic.
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is not thought that the proposed changes will positively or negatively impact people who share this protected characteristic.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is not thought that the proposed changes 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.

Public consultation will be conducted in accordance with Welsh Language Standards. All consultation supporting documents, information and surveys will be available equally in Welsh, either through our website, social media or upon request of paper/alternative formats. In addition, public consultation will be advertised bilingually, and participants will be allowed to participate in either Welsh or English.

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 proposed changes will have a negative impact on the long-term needs of some communities in Newport, particularly regarding the reduction of anti-social behaviour. The impact will be more significant if the Service is no longer delivered in certain electoral wards. However, there is a need to deliver services within the resources available to the Council in order to sustain services for the long term, and the proposal ensures that the service remains operational instead of opting for a full closure; this will mean longer term protection of Newport’s communities.</p>
<p>Prevention</p> 	<p><i>Putting resources into preventing problems occurring or getting worse</i></p>	<p>The proposed changes will have a negative impact on efforts to prevent problems for some communities in Newport, particularly regarding the reduction of anti-social behaviour. However, the service will be re-designed to ensure that maximum impact is achieved in electoral wards that have higher levels of anti-social behaviour and other problems. The fact that the proposal avoids the service being discontinued means that there will still be proactive work done in this area to prevent issues from happening, as opposed impact of deleting the service.</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>The service will be redesigned to have a positive impact on the following Well-being goals:</p> <p>Well-being Goals</p> <ul style="list-style-type: none"> • A prosperous Wales – to reduce ASB in relevant areas. ASB can impact on the education of children and on the success of businesses.

		<ul style="list-style-type: none"> • A healthier Wales – to reduce ASB in relevant areas which will help improve the mental well-being of the community that would otherwise be affected. • A Wales of cohesive communities – to help to protect local communities and make it more viable and safe. <p>The information included above shows that there would be a positive impact on Newport City Council’s Well-being Goals, as set out below:</p> <ul style="list-style-type: none"> • To improve skills, educational outcomes and employment opportunities • To promote economic growth and regeneration whilst protecting the environment • To enable people to be healthy, independent and resilient • To build cohesive and sustainable communities <p>The reduction to the service will have a negative impact on the objectives of some partner organisations such as Gwent Police at times, as the public may seek services from them as an alternative to the Council. It may also have a negative impact on the Public Spaces Protection Order work in Newport which is primarily delivered by Gwent Police but with support from the CSWS.</p>
<p>Collaboration</p> 	<p><i>Working together to deliver objectives.</i></p>	<p>The Community Safety team will continue to work together with the Police and other agencies/partners to address ASB. Alternative ways of working will be found to deliver services in the context of the proposed changes.</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>It is proposed that public consultation on the proposed changes be undertaken.</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 the Community Safety Warden Service 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?

N/A

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.

N/A

3. Does this decision contribute to a cumulative impact?

N/A

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 impacts identified on people on protected characteristics groups			
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 impact identified	Public consultation will be advertised and conducted in accordance with Welsh Language Standards		
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
Negative impact on long term and prevention of anti-social behaviour issues	Proposal allows for continuation of service as opposed to cessation which was one of the options considered, as the option that allowed to mitigate impact on communities. Detailed review of the service and options appraisal to be undertaken as part of the redesign of the service. This will allow for priorities to be set in terms of service needs and	Service Review as part of performance monitoring system in place	Service Manager

	areas of intervention, to ensure resources are allocated to the areas and communities that are most in need.		
Negative impact on well-being objectives of partners, especially Gwent Police	Closer collaboration with partners and involvement as part of the service review, to ensure their views are taken into account and there is a joint approach to maximise opportunities and coordinate efforts.	Meetings held with partners	Service Manager

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