

# Fairness and Equalities Impact Assessment (FEIA)

Version 3.6 May 2017

The purpose of this assessment is to provide balanced information to support decision making and to promote better ways of working in line with equalities (Equalities Act 2010), Welsh language promotion (The Welsh Language (Wales) Measure 2011), sustainable development (Wellbeing of Future Generations (Wales) Act 2015), and the four parameters of debate about fairness identified by the Newport Fairness Commission (NFC Full Report to Council 2013).

**Completed by:** Deborah Weston                      **Role:** Education Service Manager

**Head of Service:** Sarah Morgan                      **Date:** 05/02/2019

**I confirm that the above Head of Service has agreed the content of this assessment**

**Yes / No**

**When you complete this FEIA, it is your responsibility to submit it to**  
impact.assessment@newport.gov.uk

**1. Name and description of the policy / proposal being assessed. Outline the policy's purpose.**

The purpose is to seek final determination on the school reorganisation proposal "to establish a generic 10-place Learning Resource Base class for pupils aged between 4 years and 11 years with additional learning needs at Caerleon Lodge Hill Primary School with effect from April 2019"

**2. Outline how you have/ will involve stakeholders who will be affected by the policy/proposal**

The consultation period was undertaken in accordance with the requirements of the statutory School Organisation Code. An invitation to take part in the statutory consultation was issued to an extensive list of stakeholders, with two separate drop-in events arranged where people directly affected by the proposal could attend to find out more information and share their views. Both of these events were held at the school. Five people attended the first drop-in session, four of which were parents of children currently attending the school. The fifth was a member of staff employed by Aneurin Bevan Health Board (ABHB). Two parents joined the second session, one of whom had also attended the first drop-in. Given that the proposal is for a 10-place provision, and 5 different parents attended the drop-in sessions, this represents a good ratio of stakeholder engagement.

The Council was keen to gain the views of learners, and this was facilitated through a specific meeting between the School Council and two members of staff from the Education Service which was held on Tuesday 16th October 2018 at Caerleon Lodge Hill Primary School. Twelve children in total attended the meeting.

In accordance with the statutory School Organisation Code a statutory notice was published for the required period of 28 days between Monday 7<sup>th</sup> January 2019 until Monday 4<sup>th</sup> February 2019. The statutory proposal was published on the Newport City Council website and copies were displayed at all main entrances to Caerleon Lodge Hill Primary School. The notice was also shared with all stakeholders as outlined in the statutory School Organisation Code, including the pupils, staff and parents / carers of Caerleon Lodge Hill Primary School. The consultation passed through this statutory notice stage without objection.

### **3. What information/evidence do you have on stakeholders? e.g. views, needs, service usage etc. Please include all the evidence you consider relevant.**

The statutory Code outlines the key stakeholders who should be consulted with as part of this process. This list is not exclusive however, and the Council has identified and added to this as a result of feedback received in relation to previous proposals. An invitation to take part in the statutory consultation was issued to the stakeholders outlined below, with either a link to the consultation pack on the Council's website and an electronic version of the pack sent by e-mail, or alternatively by hard copies of the consultation material being issued:

- Teachers, staff and the governing body of Caerleon Lodge Hill Primary School;
- Parents, carers and guardians of pupils attending Caerleon Lodge Hill Primary School;
- Pupils at Caerleon Lodge Hill Primary School (facilitated through the school council);
- The Headteachers and Governing Bodies of all schools within the Caerleon Comprehensive School cluster: Caerleon Comprehensive School, Charles Williams Church in Wales Primary School and Langstone Primary School;
- The Headteachers and Governing Bodies of those schools in Newport that currently host Learning Resource Base provision: Alway Primary School, Crindau Primary School, Gaer Primary School, Kimberley Nursery School, Llanmartin Primary School, Malpas Court Primary School, Monnow Primary School, Pillgwenlly Primary School, Ringland Primary School, Rogerstone Primary School, St Andrews Primary School, The John Frost School and St Julians School;
- All Newport City Council elected members;
- The Welsh Ministers;
- Assembly Members (AMs) and Members of Parliament (MPs) representing the area served by the schools subject to the proposals;
- Other Local Authorities across the South East Wales Consortium region, including relevant Transport departments;
- The South East Wales Education Achievement Service;
- The Church in Wales, Diocese of Monmouth;
- Roman Catholic Archdiocese;
- Estyn;
- Teaching and staff trade unions representing teachers and staff at Caerleon Lodge Hill Primary School;
- The Police and Crime Commissioner for Gwent;
- Gwent Police;
- South Wales Fire and Rescue Service;
- Aneurin Bevan Health Board;
- Public Health Wales;
- Newport Serennu Centre;
- SNAP Cymru;
- Gwent Association of Voluntary Organisations;
- Preventative Services.

Following the end of the consultation period, a Consultation Report was produced and published on the Council website. The statutory proposal was also published on the Council website and copies were displayed at all main entrances to Caerleon Lodge Hill Primary School. The notice was also shared with all stakeholders as outlined above. The consultation passed through this statutory notice stage without objection.


#### 4. Equalities and Welsh language impact

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
<b>Age</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The establishment of a new Learning Resource Base will support the increasing demand for English-medium primary specialist education provision across the city of Newport, a need which has grown significantly over the past 5-10 years. There is currently no such Learning Resource Base provision within the Caerleon or St Julian's cluster areas. This proposal will therefore benefit young people living locally but is not exclusive to those living within this cluster area. It can be accessed by young people across the city to support specific education needs in an appropriate and secure environment. All staff employed at the school will be treated equitably regardless of their status within this protected characteristic.
<b>Disability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Council is committed to providing Learning Resource Base facilities for pupils with Additional Learning Needs in all new school builds as this supports a more inclusive approach for pupils who require additional support within a mainstream environment. There is also a desire to move to a position where there is a least one Learning Resource Base class in each cluster of primary schools. There is currently no such provision within the Caerleon cluster, or in the neighbouring St Julian's cluster. The new school building will be fully DDA compliant. All staff employed at the school will be treated equitably regardless of their status within this protected characteristic.
<b>Gender reassignment/ transgender</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Any pupils, parents / carers and staff falling into this protected characteristic will be treated equitably in line with the relevant policies as adopted by the governing body of the school.  The policies surrounding the LRB will be developed to support any pupils, parents / carers and staff falling into this protected characteristic.
<b>Marriage or civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All staff employed at the school will be treated equitably regardless of their status within this protected characteristic.

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
Pregnancy or maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>All staff employed at the school will be treated equitably regardless of their status within this protected characteristic.</p> <p>The policies surrounding the LRB will be developed to support any pupils, parents / carers and staff falling into this protected characteristic.</p>
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The establishment of a new Learning Resource Base will support the increasing demand for primary specialist education provision across the city of Newport, a need which has grown significantly over the past 5-10 years. There is currently no such Learning Resource Base provision within the Caerleon or St Julian's cluster areas. This proposal will therefore benefit pupils living locally but is not exclusive to those living within this cluster area. It can be accessed by pupils across the city to support specific education needs in an appropriate and secure environment.</p> <p>All pupils attending the school and staff employed at the school will be treated equitably regardless of their status within this protected characteristic. There is no evidence that suggests that there is a higher probability of additional learning needs affecting BAME pupils.</p>
Religion or Belief or non-belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Caerleon Lodge Hill Primary School is a community primary school. However the school follows all aspects of the national curriculum. All pupils attending the school and staff employed at the school will be treated equitably regardless of their status within this protected characteristic.</p>
Sex/ Gender Identity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The establishment of a new Learning Resource Base will support the increasing demand for primary specialist education provision across the city of Newport, a need which has grown significantly over the past 5-10 years. There is currently no such Learning Resource Base provision within the Caerleon or St Julian's cluster areas. This proposal will therefore benefit pupils living locally but is not exclusive to those living within this cluster area. It can be accessed by pupils across the city to support specific education needs in an appropriate and secure environment.</p>

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
				All stakeholders associated with the school and all will be treated equitably regardless of their status under this protected characteristic. Statistically, there is a higher probability of additional learning needs affecting male children over female children.
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Any stakeholders falling into this protected characteristic will be treated equitably in line with the relevant policies as adopted by the governing body of the school.
<b>Welsh Language</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Caerleon Lodge Hill Primary School is an English-medium school. While, it does follow all aspects of the national curriculum in relation to Welsh as a Second Language, it is unlikely to make a meaningful contribution to Newport's 5-Year Welsh Language target of increasing the number of Welsh speakers in the city.


## 5 How has your proposal embedded and prioritised the sustainable development principle in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p>Long Term</p> <p>Balancing short term need with long term needs</p>	<p><b><i>Yes by supporting the increasing demand for specialist education provision across the primary school sector and enabling pupils to attend a school more local to their home address.</i></b></p>

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p data-bbox="240 1128 349 1146">Collaboration</p> <p data-bbox="145 1155 379 1211">Working together to deliver objectives</p>	<p data-bbox="459 286 1410 405"><i>This proposal was discussed in detail with the governing body of Caerleon Lodge Hill Primary School before being pursued. An invitation to take part in the statutory consultation was issued to the stakeholders outlined below:</i></p> <ul data-bbox="459 409 1410 1742" style="list-style-type: none"> <li>• <i>Teachers, staff and the governing body of Caerleon Lodge Hill Primary School;</i></li> <li>• <i>Parents, carers and guardians of pupils attending Caerleon Lodge Hill Primary School;</i></li> <li>• <i>Pupils at Caerleon Lodge Hill Primary School (via the school council);</i></li> <li>• <i>The Headteachers and Governing Bodies of all schools within the Caerleon Comprehensive School cluster: Caerleon Comprehensive School, Charles Williams Church in Wales Primary School and Langstone Primary School;</i></li> <li>• <i>The Headteachers and Governing Bodies of those schools in Newport that currently host Learning Resource Base provision: Alway Primary School, Crindau Primary School, Gaer Primary School, Kimberley Nursery School, Llanmartin Primary School, Malpas Court Primary School, Monnow Primary School, Pillgwenlly Primary School, Ringland Primary School, Rogerstone Primary School, St Andrews Primary School, The John Frost School and St Julians School;</i></li> <li>• <i>All Newport City Council elected members;</i></li> <li>• <i>The Welsh Ministers;</i></li> <li>• <i>Assembly Members (AMs) and Members of Parliament (MPs) representing the area served by the schools subject to the proposals;</i></li> <li>• <i>Other Local Authorities across the South East Wales Consortium region, including relevant Transport departments;</i></li> <li>• <i>The South East Wales Education Achievement Service;</i></li> <li>• <i>The Church in Wales, Diocese of Monmouth;</i></li> <li>• <i>Roman Catholic Archdiocese;</i></li> <li>• <i>Estyn;</i></li> <li>• <i>Teaching and staff trade unions representing teachers and staff at Caerleon Lodge Hill Primary School;</i></li> <li>• <i>The Police and Crime Commissioner for Gwent;</i></li> <li>• <i>Gwent Police;</i></li> <li>• <i>South Wales Fire and Rescue Service;</i></li> <li>• <i>Aneurin Bevan Health Board;</i></li> <li>• <i>Public Health Wales;</i></li> <li>• <i>Newport Serennu Centre;</i></li> <li>• <i>SNAP Cymru;</i></li> <li>• <i>Gwent Association of Voluntary Organisations;</i></li> <li>• <i>Preventative Services.</i></li> </ul> <p data-bbox="459 1747 1410 1921"><i>Following the end of the consultation period, a Consultation Report was produced and published on the Council website. The statutory proposal was also published on the Council website and copies were displayed at all main entrances to Caerleon Lodge Hill Primary School. The notice was also shared with all stakeholders as outlined above. The consultation passed through this statutory notice stage without objection.</i></p>

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p data-bbox="245 669 354 689">Involvement</p> <p data-bbox="145 714 416 801">Involving those with an interest and seeking their views</p>	<p data-bbox="459 286 1407 562"><i>Two separate drop-in events arranged where people directly affected by the proposal could attend to find out more information and share their views. Both of these events were held at the school. Five people attended the first drop-in session, four of which were parents of children currently attending the school. The fifth was a member of staff employed by Aneurin Bevan Health Board (ABHB). Two parents joined the second session, one of whom had also attended the first drop-in. Given that the proposal is for a 10-place provision, and 5 different parents attended the drop-in sessions, this represents a good ratio of stakeholder engagement.</i></p> <p data-bbox="459 593 1407 741"><i>The Council was keen to gain the views of learners, and this was facilitated through a specific meeting between the School Council and two members of staff from the Education Service which was held on Tuesday 16th October 2018 at Caerleon Lodge Hill Primary School. Twelve children in total attended the meeting.</i></p> <p data-bbox="459 772 1407 1043"><i>In accordance with the statutory School Organisation Code a statutory notice was published for the required period of 28 days between Monday 7<sup>th</sup> January 2019 until Monday 4<sup>th</sup> February 2019. The statutory proposal was published on the Newport City Council website and copies were displayed at all main entrances to Caerleon Lodge Hill Primary School. The notice was also shared with all stakeholders as outlined in the statutory School Organisation Code, including the pupils, staff and parents / carers of Caerleon Lodge Hill Primary School. The consultation passed through this statutory notice stage without objection.</i></p>
 <p data-bbox="233 1400 333 1420">Prevention</p> <p data-bbox="145 1435 405 1552">Putting resources into preventing problems occurring or getting worse</p>	<p data-bbox="459 1052 1407 1140"><i>The need for specialist education provision has grown significantly over the past 5-10 years and there is currently no primary Learning Resource Base provision within the Caerleon or St Julian's cluster areas.</i></p> <p data-bbox="459 1171 1026 1202"><i>This proposal has the following advantages:</i></p> <ul data-bbox="499 1211 1407 1570" style="list-style-type: none"> <li>• <i>Creation of a primary Learning Resource Base within the Caerleon cluster;</i></li> <li>• <i>Increased availability of places to accommodate pupils who require supported mainstream placements;</i></li> <li>• <i>Increased opportunities for pupils accessing supported provision to reintegrate into mainstream classes;</i></li> <li>• <i>Effective use of space within the new school building;</i></li> <li>• <i>Better use of resources;</i></li> <li>• <i>Increased opportunities for staff development;</i></li> <li>• <i>Improved parental and community engagement.</i></li> </ul> <p data-bbox="459 1601 1407 1753"><i>The proposal will benefit pupils living locally but will not be exclusive to those living in these areas. The new provision will be available to be accessed by pupils living across the city to support additional learning needs in an appropriate and secure mainstream environment. This will enable children to attend a school more local to their home address.</i></p>



Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p data-bbox="245 432 336 454">Integration</p> <p data-bbox="145 472 414 589">Considering impact on all wellbeing goals together and on other bodies</p>	<p data-bbox="459 286 1412 499"><i>A formal statutory consultation has been carried out with key stakeholders, the outcome of which is detailed within the consultation report. The proposal supports the “A prosperous Wales”, “A more equal Wales” and “A Wales of cohesive communities” Well-being Goals and has no adverse effect on any of the other Well-being Goals. In addition, this proposal supports the Newport City Council Well-being Objective “To improve skills, educational outcomes and employment opportunities”.</i></p>

## 6 Will the proposal/policy have a disproportionate impact on a specific geographical area of Newport?

The Council is committed to providing Learning Resource Base facilities in all new school builds as this supports a more inclusive approach for pupils with additional learning needs. There is also a desire to move to a position where there is a least one Learning Resource Base class in each cluster of primary schools. There is currently no such provision within the Caerleon cluster, or in the neighbouring St Julian’s cluster.

This proposal will therefore benefit pupils living locally but is not exclusive to those living within this cluster area. It can be accessed by pupils across the city to support specific education needs in an appropriate and secure environment.

## 7 How does the proposal/policy relate to the parameters of debate about Fairness identified by the Newport Fairness Commission

This proposal supports the increasing demand for specialist education provision across the city of Newport, a need which has grown significantly over the past 5-10 years. There is currently no such Learning Resource Base provision within the Caerleon or St Julian’s cluster areas. This proposal will therefore benefit pupils living locally but is not exclusive to those living within this cluster area. It can be accessed by pupils across the city to support specific education needs in an appropriate and secure environment.

## 8 Taking this assessment as a whole, what could be done to mitigate any negative impacts of your policy and better contribute to positive impacts?

The proposal was subject to full stakeholder consultation and any feedback was taken into consideration when deciding how to proceed. The stakeholders had the opportunity to make legal objections at the statutory notice stage but no objections were received.

## 9 Monitoring, evaluating and reviewing

The impact of the proposal will be evaluated following full implementation. This FEIA has been reviewed and updated at each stage of the process.



## 10 Involvement

A full programme of stakeholder engagement was implemented to support the formal consultation and included drop-in sessions where people could find out more about the proposal. There was also an opportunity to hear the pupil voice through the school council. All stakeholders were given the opportunity to lodge formal objections at the statutory notice stage; no objections were received.

## 11 Summary of Impact (for inclusion in any report)

### **Equality Act 2010 AND Welsh Language**

The Council is committed to providing Learning Resource Base facilities in all new school builds as this supports a more inclusive approach for pupils with additional learning needs. There is also a desire to move to a position where there is a least one Learning Resource Base class in each cluster of primary schools. There is currently no such provision within the Caerleon cluster, or in the neighbouring St Julian's cluster.

In order to support teaching pupils with additional learning needs where full-time mainstream education is not deemed appropriate, the Local Authority has numerous Learning Resource Bases across the City, hosted by individual schools. These Learning Resource Bases are attached to mainstream schools and provide learning environments that have fewer pupil numbers with enhanced adult ratios. The Learning Resource Bases are generic in nature and meet the needs of pupils with a range of difficulties. The ethos is to provide targeted support to the individual pupils based on their needs with the intention of integrating the pupil back into mainstream classes as appropriate. There is an on-going demand for primary Learning Resource Base placements across Newport.

This proposal supports the increasing demand for specialist education provision across the city of Newport, a need which has grown significantly over the past 5-10 years. There is currently no such Learning Resource Base provision within the Caerleon or St Julian's cluster areas. This proposal will therefore benefit pupils living locally but is not exclusive to those living within this cluster area. It can be accessed by pupils across the city to support specific education needs in an appropriate and secure environment.

Caerleon Lodge Hill Primary School is an English-medium community school. The school will continue to promote the Welsh language in all ways possible and will follow all aspects of the national curriculum.

### **Wellbeing of Future Generations (Wales) Act 2015**

In summary this proposal supports wellbeing by supporting a more inclusive approach for pupils with additional learning needs. The Council is committed to providing Learning Resource Base facilities in all new school builds. There is also a desire to move to a position where there is a least one Learning Resource Base class in each cluster of primary schools. There is currently no such provision within the Caerleon cluster, or in the neighbouring St Julian's cluster. The establishment of this Learning Resource Base will enable pupils with additional learning needs to be taught in schools more local to their home addresses.