

# EQUALITY IMPACT ASSESSMENT FORM

July 2019

## THE COUNCIL'S EQUALITIES STATEMENT

This Council recognises that people have different needs, requirements and goals and we will work actively against all forms of discrimination by promoting good relations and mutual respect within and between our communities, residents, elected members, job applicants and workforce.

We will also work to create equal access for everyone to our services, irrespective of ethnic origin, sex, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependents or any other reason which cannot be shown to be justified.

EIAs are a legal requirement under equalities legislation (Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011) where the potential for a significant negative impact has been identified. This legislation has been in place since 2000. We also have a legislative duty to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The protected characteristics are:

- |                                  |                                  |
|----------------------------------|----------------------------------|
| • Age                            | • Race                           |
| • Disability                     | • Religion, Belief or Non-Belief |
| • Gender Re-assignment           | • Sex                            |
| • Marriage and Civil Partnership | • Sexual Orientation             |
| • Pregnancy and Maternity        | • Welsh Language*                |

\* The Welsh language is not identified as a protected characteristic under the Equality Act 2010, however in Wales we also have to treat Welsh and English on an equal basis as well as promoting and facilitating the use of the Welsh language.

## THE EQUALITY IMPACT ASSESSMENT

|   |                                       |
|---|---------------------------------------|
| <b>NAME OF NEW OR REVISED PROPOSAL*</b> | Strategic Equality Plan 2020-2024     |
| <b>DIRECTORATE</b>                      | Education and Corporate Services      |
| <b>SERVICE AREA</b>                     | Business Improvement and Partnerships |
| <b>CONTACT OFFICER</b>                  | Anwen Cullinane                       |
| <b>DATE FOR NEXT REVIEW OR REVISION</b> | 2024                                  |

**\*Throughout this Equalities Impact Assessment Form, ‘proposal’ is used to refer to what is being assessed, and therefore includes policies, strategies, functions, procedures, practices, initiatives, projects and savings proposals.**

The aim of an Equality Impact Assessment (EIA) is to ensure that Equalities and Welsh Language issues have been proactively considered throughout the decision making processes governing work undertaken by every service area in the Council as well as work done at a corporate level.

The Council’s work across Equalities, Welsh Language and Human Rights is covered in more detail through the **Equalities and Welsh Language Objectives and Action Plan 2016-2020**.

When carrying out an EIA you should consider both the positive and negative consequences of your proposals. If a project is designed for a specific group e.g. disabled people, you also need to think about what potential effects it could have on other areas e.g. young people with a disability, BME people with a disability.

There are a number of supporting guidance documents available on the **Corporate Policy Unit Portal** and the Council’s Equalities and Welsh Language team can provide advice as the EIA is being developed. Please note that the team does not write EIAs on behalf of service areas, the support offered is in the form of advice, suggestions and in effect, quality control.

Contact [equalities@caerphilly.gov.uk](mailto:equalities@caerphilly.gov.uk) for assistance.

## PURPOSE OF THE PROPOSAL

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| <b>1</b> | <p><b>What is the proposal intended to achieve?</b><br/><i>(Please give a brief description and outline the purpose of the new or updated proposal by way of introduction.)</i></p> <p>The Strategic Equality Plan (SEP) and equality objectives contained within it have been developed to document the steps that the Council intends to take to meet its specific duties. It covers all protected characteristics: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, sexual orientation. It contains information about how the Council promotes equality, fosters good relations and deals with discrimination and harassment across all its services.</p> |
| <b>2</b> | <p><b>Who are the service users affected by the proposal?</b><br/><i>(Who will be affected by the delivery of this proposal? e.g. staff members, the public generally, or specific sections of the public i.e. youth groups, carers, road users, people using country parks, people on benefits etc. Are there any data gaps?)</i></p> <p>Everyone who lives, works or visits the county borough, including members of staff, stakeholders, citizens, elected members and visitors of all protected characteristics.</p>  |

## IMPACT ON THE PUBLIC AND STAFF

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| <b>3</b> | <p><b>Does the proposal ensure that everyone has an equal access to all the services available or proposed, or benefits equally from the proposed changes, or does not lose out in greater or more severe ways due to the proposals?</b><br/><i>(What has been done to examine whether or not these groups have equal access to the service, or whether they need to receive the service in a different way from other people?)</i></p> <p>Yes the Strategic Equality Plan looks to identify and address any identified barriers which prevent people with protected characteristics from accessing services and to work with them to find solutions.</p> |
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| <b>4</b>                                | <b>Is your proposal going to affect any people or groups of people with protected characteristics?</b><br><i>(Has the service delivery been examined to assess if there is any indirect effect on any groups? Could the consequences of the policy or savings proposal differ dependent upon people's protected characteristics?)</i> |  |
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| <b>Protected Characteristic</b>         | <b>Positive, Negative, Neutral</b>  | <b>What will the impact be?<br/>If the impact is negative how can it be mitigated?</b>   |
| <b>Age</b>                              | Positive  | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic. We consulted with the 50+ Forum on the Draft SEP Objectives. Feedback from the consultation has helped inform us of the relevant actions to deliver our services in a more improved and inclusive way.   |
| <b>Disability</b>                       | Positive  | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic. We consulted with the 50+ Forum, Caerphilly People First, Disability Wales and Disability Cando. Feedback from the consultation has helped inform us of the relevant actions to deliver our services in a more improved and inclusive way.   |
| <b>Gender Reassignment</b>              | Positive  | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic. Umbrella Cymru, Stonewall Cymru and CCBC's LGBT Youth Group were consulted. Feedback from the consultation has helped inform us of the relevant actions to deliver our services in a more improved and inclusive way.  |
| <b>Marriage &amp; Civil Partnership</b> | Positive  | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic.  |
| <b>Pregnancy and Maternity</b>          | Positive  | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic.  |
| <b>Race</b>                             | Positive  | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic. Whilst an effort was made to engage with all sectors of the community, it is evident that no responses were received from individuals representing local black and minority ethnic community. This has been included as an action under Strategic Equality Objective 4 - <i>Review and update our key stakeholder groups within the county borough that represent protected characteristic groups.</i> |
| <b>Religion &amp; Belief</b>            | Positive  | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic. Whilst an effort was made to engage with all sectors of the community, it is evident that no responses were received from individuals representing local religious groups. This has been included as an action under Strategic Equality Objective <i>Review and update our key stakeholder groups within the county borough that represent protected characteristic groups.</i>                        |

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| <b>Sex</b>                | Positive | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic. We consulted with Chwarae Teg specifically.   |
| <b>Sexual Orientation</b> | Positive | The SEP has been written to ensure that nobody is discriminated against regardless of protected characteristic. Umbrella Cymru, Stonewall Cymru and CCBC's LGBT Youth Group were consulted. Feedback from the consultation has helped inform us of the relevant actions to deliver our services in a more improved and inclusive way. |

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| <b>5</b> | <p><b>In line with the requirements of the Welsh Language Standards. (No.1) Regulations 2015, please note below what effects, if any (whether positive or adverse), the proposal would have on opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the English language.</b></p> <p><i>(The specific Policy Making Standards requirements are Standard numbers 88, 89, 90, 91, 92 and 93. The full detail of each Standard is available on the Corporate Policy Unit Portal. Although it is important that what is outlined in the proposal is available in Welsh and English, please consider wider impacts on Welsh speakers.)</i></p> <p>No negative impact on the Welsh language.</p> <p>Although Welsh language issues are not covered by the <b>Equality Act 2010</b> but have a set of standards under the <b>Welsh Language (Wales) Measure 2011</b>. These are detailed in the regulations approved by Welsh Government as the <b>Welsh Language Standards (No. 1) Regulations 2015</b>.</p> <p>One of the Strategic Equality Objective's is specifically on the Welsh Language with its aim being to ensure that the Welsh speaking public can access services that comply with the statutory requirements</p> |
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## INFORMATION COLLECTION

6

**Please outline any evidence and / or research you have collected which supports the proposal? This can include an analysis of service users.**

*(Is this service effectively engaging with all its potential users or is there higher or lower participation of uptake by one or more protected characteristic groups? If so, what has been done to address any difference in take up of the service? Does any savings proposal include an analysis of those affected?)*

Our Strategic Equality Objectives will support us to continue making progress in advancing equality and inclusion for all protected characteristics and help us meet the Public Sector Equality Duty. The objectives will also ensure that we are meeting our obligations as outlined in the framework of the Well-being of Future Generations (Wales) Act 2015.

In writing the plan we drew information from current plans that the council has in place set alongside relevant legislation and reports;

[Corporate Plan 2018-2023](#)

**Equality Act 2010**

**Welsh Language (Wales) Measure 2011**

Welsh Government's *Well-being of Future Generations (Wales) Act 2015*

**Social Services and Well-being (Wales) Act 2014**

- [Caerphilly Public Services Board's Well-being Plan 2018-2023](#)
- [Is Wales Fairer? 2015\(EHRC\)](#)
- [Is Wales Fairer? 2018 Report \(EHRC\)](#)
- [Welsh Government - Digital Inclusion Framework](#)
- [Caerphilly County Borough Council – Customer and Digital Strategy](#)
- [Prosperity for All Action Plan](#)
- [Cymraeg 2050](#)
- [Council's Compliance Notice - Welsh Language Standards](#)
- [Five Year Welsh Language Strategy](#)
- [Nurture, Equip and Thrive \(NET\)](#)
- [Community Cohesion National Delivery Plan 2014-2016](#)
- [Communication and Engagement Strategy](#)
- [Team Caerphilly – Better Together Transformation Strategy](#)
- [Level 2 Disability Confident Employer](#)
- [Stonewall Diversity Champions](#)
- [Chwarae Teg – State of the Nation 2019 Report](#)

## CONSULTATION

7

**Please outline the consultation / engagement process and outline any key findings.**

*(Include method of consultation, objectives and target audience. What steps have been taken to ensure that people from various groups have been consulted during the development of this proposal? Have you referred to the Equalities Consultation and Monitoring Guidance?)*

A formal consultation was conducted from 11 November 2019 to 6 December 2019. The consultation was widely promoted, accessible on a variety of platforms and was available bilingually and in easy read format.

The consultation was published on the Council's website. Downloadable versions of the survey were available in a variety of formats on request. Details of the consultation were shared via the Council's social media platforms reaching 4173 people and resulting in 187 engagements. A press release was prepared for local media and promoted on the Council's Website.

A number of engagement events with key stakeholder groups were held; members of staff from the Equalities, Welsh Language and Consultation Team attended the County meeting of Caerphilly People First and Parent Network Groups to seek participants' views in relation to each of the draft equalities objectives. A British Sign Language facilitator met with Deaf people across the county borough, she documented their views on the draft plan, and provided a summary of their comments. Similarly, Disability CanDo carried out consultation sessions with Disability Groups to seek their views on the draft equality objectives.

Consultation responses highlighted a number of overarching themes as well as specific issues and barriers in relation to the draft objectives outlined.

Whilst an effort was made to engage with all sectors of the community, it is evident that no responses were received from individuals representing local religious groups or the black and minority ethnic community. This has been addressed as an action under Strategic Equality Objective 4 - *Review and update our key stakeholder groups within the county borough that represent protected characteristic groups.*

To view the full consultation please see the associated [Consultation Report](#)

## MONITORING AND REVIEW

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| <b>8</b>  | <p><b>How will the proposal be monitored?</b><br/><i>(What monitoring process has been set up to assess the extent that the service is being used by all sections of the community, or that the savings proposals are achieving the intended outcomes with no adverse impact? Are comments or complaints systems set up to record issues by Equalities category to be able analyse responses from particular groups?)</i></p> <p>The equality objectives have associated actions to make them measurable and results orientated. Progress will be monitored through service planning and Directorate Performance Assessments. These assessments are designed to bring together a range of separate reporting information into one 'single source of the truth'. The purpose is to provide learning into how each Directorate is performing, identifying cause and effect and to act on this knowledge to improve. This will include equality and language information and is also reported to Scrutiny Committees and Cabinet.</p> <p>Once a year we report to the public on how we are performing against our Well-being Objectives and include updates on equalities and Welsh language improvements. We identify what has not gone well and what we have learnt and what we are doing to improve.</p> <p>Under the Public Sector Equality Duty the Council has a legal duty to produce and publish a Strategic Equality Plan Annual Monitoring Report which reports on the Council's progress in delivering services against the statutory duties, the public sector equality Duties and the Council's own Strategic Equality Objectives. The report must be published by the 31<sup>st</sup> March each year.</p> |
| <b>9</b>  | <p><b>How will the monitoring be evaluated?</b><br/><i>(What methods will be used to ensure that the needs of all sections of the community are being met?)</i></p> <p>We will ensure that the actions outlined in the SEP will be delivered over its 4 year duration.</p>  |
| <b>10</b> | <p><b>Have any support / guidance / training requirements been identified?</b><br/><i>(Has the EIA or consultation process shown a need for awareness raising amongst staff, or identified the need for Equalities or Welsh Language training of some sort?)</i></p> <p>A number of training requirements were identified and have been incorporated as actions in the SEP</p>  |
| <b>11</b> | <p><b>If any adverse impact has been identified, please outline any mitigation action.</b></p> <p>N/A</p>   |



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| <b>12</b> | <p><b>What wider use will you make of this Equality Impact Assessment?</b><br/> <i>(What use will you make of this document i.e. as a consultation response, appendix to approval reports, publicity etc. in addition to the mandatory action shown below?)</i></p> <p>The EIA will be appended to the report and the SEP for approval.</p> |
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| <b>13</b> | <p><b>An equality impact assessment may have four possible outcomes, through more than one may apply to a single proposal. Please indicate the relevant outcome(s) of the impact assessment below.</b></p> <p style="text-align: right;"><b>Please tick as appropriate:</b></p> <p><b>No major change</b> – the impact assessment demonstrated that the proposal was robust; there was no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <input checked="" type="checkbox"/></p> <p><b>Adjust the proposal</b> – the impact assessment identified potential problems or missed opportunities. The proposal was adjusted to remove barriers or better promote equality. <input type="checkbox"/></p> <p><b>Continue the proposal</b> – the impact assessment identified the potential problems or missed opportunities to promote equality. The justification(s) for continuing with it have been clearly set out. (The justification must be included in the impact assessment and must be in line with the duty to have due regard. Compelling reasons will be needed for the most important relevant proposals.) <input type="checkbox"/></p> <p><b>Stop and remove the proposal</b> – the impact assessment identified actual or potential unlawful discrimination. The proposal was stopped and removed, or changed. <input type="checkbox"/></p> |
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| <b>Form completed by:</b> |   |
| <b>Name:</b>              | Anwen Cullinane   |
| <b>Job Title:</b>         | Senior Policy Officer – Equalities, Welsh Language and Consultation |
| <b>Date:</b>              | 06.12.19  |

|                                 |                 |
|---------------------------------|-----------------|
| <b>Head of Service Approval</b> |                 |
| <b>Name:</b>                    | Stephen Harries |
| <b>Job Title:</b>               |                 |
| <b>Signature:</b>               |                 |
| <b>Date:</b>                    |                 |