

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Welsh Language (Wales) Measure 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

**PLEASE NOTE:** Section 3 *Socio-economic Duty* only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

<b>1. Proposal Details</b>			
Lead Officer	Head of Service	Service Area & Department	Date
Paul O'Neill	Paul Warren	Youth Service/School Improvement	15/3/21

Is this proposal a... (please tick relevant box)									
Policy	<input type="checkbox"/>	Strategy / Plan	<input checked="" type="checkbox"/>	Practice	<input type="checkbox"/>	Procedure	<input type="checkbox"/>	Restructure	<input type="checkbox"/>

What is the proposal to be assessed? <i>Provide brief details of the proposal and provide a link to any relevant report or documents.</i>
That the new CCBC NEETs strategy is adopted in this year (2021) and informs practice for the next 3 years, subject to regular review and revision.

## 2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

*(The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one protected characteristic.*

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<b>Age</b> <i>(people of all ages)</i>	Positive impact on young people, including those with protected characteristics, allowing for more effective interventions with young people who are either currently or are at risk of becoming NEET. NEET characteristics are similar to mental health and homelessness markers, therefore implementation of the strategy would benefit multiple types of young people with vulnerabilities.		Significant NEETs, mental health and homelessness data is recorded and interrogated via the youth Service and others’ recording, management and quality systems.
<b>Disability</b> <i>(people with disabilities/ long term conditions)</i>	Disability can prove a significant barrier to young people’s transition to employment, training and further education. Adoption of an authority-wide approach to addressing such barriers would assist in this regard.		As above but including Disability-related intelligence
<b>Gender Reassignment</b> <i>(anybody who’s gender identity or gender expression is different to the sex they were assigned at birth)</i>	Positive impact of the Youth Service’s LGBT support arrangements.		LGBT young people are at higher risk of NEETs incidence and the NEETs strategy will help consolidate the work of this type as an extension of the Youth Service’s County LGBT

			support group.
<b>Marriage or Civil Partnership</b> ( <i>people who are married or in a civil partnership</i> )	Neutral		
<b>Pregnancy and Maternity</b> ( <i>women who are pregnant and/or on maternity leave</i> )	<b>Positive impact. A significant number of young people are registered as unfit for work each year as a consequence of unplanned pregnancy.</b>		Careers Wales annual statistical release – NEETs data.
<b>Race</b> ( <i>people from black, Asian and minority ethnic communities and different racial backgrounds</i> )	Neutral		
<b><u>Protected Characteristics</u></b>	<b>Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?</b>	<b>If there are negative impacts how will these be mitigated?</b>	<b>What evidence has been used to support this view?</b>
<b>Religion or Belief</b> ( <i>people with different religions and beliefs including people with no beliefs</i> )	Neutral		
<b>Sex</b> ( <i>women and men, girls and boys and those who self-identify their gender</i> )	Neutral		

<b>Sexual Orientation</b> <i>(lesbian, gay, bisexual, heterosexual)</i>	<b>Positive impact on young people 11-25: LGBT.</b>		<b>As per previous LGBT commentary</b>
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**3. Socio-economic Duty (Strategic Decisions Only)**  
*(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)*

**Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:**

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People misusing substances
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system

<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<b>Low Income / Income Poverty</b> <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	<b>Positive impact on young people 11-25, including</b> <ul style="list-style-type: none"> <li>➤ Single parents and vulnerable families</li> <li>➤ People with low literacy/numeracy</li> <li>➤ Looked after children</li> <li>➤ Homeless people</li> <li>➤ Carers</li> <li>➤ Armed Forces Community</li> <li>➤ Students</li> <li>➤ Single adult households</li> <li>➤ People misusing substances</li> <li>➤ People of all ages leaving a care</li> </ul>		<b>The Youth Service’s equalities monitoring arrangements and Education’s data collection team evidences the incidence of NEETs status amongst many of these groups.</b>

	<p>setting</p> <ul style="list-style-type: none"> <li>➤ People living in the most deprived areas in Wales (WIMD)</li> <li>➤ People involved in the criminal justice system</li> </ul>		
<b><u>Socio-economic Disadvantage</u></b>	<b>Does the proposal have any positive, negative or neutral impacts on the following and how?</b>	<b>If there are negative impacts how will these be mitigated?</b>	<b>What evidence has been used to support this view?</b>
<b>Low and/or No Wealth</b> ( <i>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</i> )	<b>Positive</b>		<b>As above</b>
<b>Material Deprivation</b> ( <i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i> )	<b>As above</b>		<b>As above</b>
<b>Area Deprivation</b> ( <i>where you live (rural areas), where you work (accessibility of public transport)</i> )	<b>As above</b>		<b>As above</b>
<b>Socio-economic Background</b> ( <i>social class i.e. parents education, employment and income</i> )	<b>As above. A formalised NEETs strategy will allow for the greater integration of NEETs engagement practices, therefore greater opportunity to work more effectively and collaboratively with young people and families with challenging socio-economic backgrounds.</b>		<b>As above.</b>

<p><b>Socio-economic Disadvantage</b>  <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p><b>Anticipated impact includes the prevention of young people becoming NEET (Not in Education, Employment or Training) and their successful transition and progression following the end of their compulsory education.</b></p>		<p><b>LA NEETs statistics/Engagement and Progression data and modelling</b></p>

#### 4. Corporate Plan – Council’s Well-being Objectives

*(How does your proposal deliver against any/all of the Council’s Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) [Well-being Objectives](#)*

<p><b>Objective 1</b> - Improve education opportunities for all</p>	<p>The Youth Service, as a consequence of the criteria for success contained in the strategy, can reposition its resources more effectively for NEETs purposes</p>
<p><b>Objective 2</b> - Enabling employment</p>	<p>The associated improvements in service delivery will see a greater blending of NEETs provision, as part of the Engagement and Progression duty that is placed with the Youth Service.</p>
<p><b>Objective 3</b> - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people’s well-being</p>	<p>Nil</p>
<p><b>Objective 4</b> - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment</p>	<p>The enactment of this proposal will help improve the accessibility of EET opportunities for young people and allow greater levels of attendance at destinations-related briefings and related opportunities.</p>
<p><b>Objective 5</b> - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle with in the Well-being of Future Generations (Wales) Act 2015</p>	<p>Health matters are a significant barrier to EET for many young people and the publication of the strategy will further legitimise organisation’s interventions in this regard.</p>
<p><b>Objective 6</b> - Support citizens to remain independent and improve their well-being</p>	<p>The resolution of NEETs status is intrinsically linked to their wellbeing. Furthermore, a critical measure of successful transition 16 + is the move to independence by young people</p>

#### 4a. Links to any other relevant Council Policy






*(How does your proposal deliver against any other relevant Council Policy?)*

**There is significant co-terminus with the Education Directorate's Inclusion Strategy – therefore the NEETs strategy will directly support the inclusion of young people in existing institutions such as schools and challenge any barriers to success that may be faced as a consequence of facing any number and/or type of the vulnerabilities that are consequently (to the publication of the NEETs Strategy) engaged with.**



## 5. Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)

*(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)*

<u>Ways of Working</u>	How have you used the Sustainable Development Principles in forming the proposal?
<p><b>Long Term</b></p> 	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p><b>The proposal is made against the backdrop of achieving lasting and positive change for young people that find themselves at risk of becoming NEET, allowing the Youth Service and its partners to respond more effectively to the needs of young people, and their communities.</b></p>
<p><b>Prevention</b></p> 	<p>Consider how the proposal is preventing problems from occurring or getting worse</p> <p><b>The Youth Service is the main service of young people’s inclusion in the Authority and as such has a significant prevention remit in terms of Anti-social Behaviour, poor mental and physical health, Homelessness, NEETs and School disengagement.</b></p>
<p><b>Integration</b></p> 	<p>Consider how your proposal will impact on other services provided in our communities (these might be Council services or services delivered by other organisations or groups)</p> <p><b>The Youth Service’s role is to integrate and reintegrate young people into their communities, into education and into employment/training. The flexibilities supported by the content of the NEETs strategy would assist in this activity.</b></p>
<p><b>Collaboration</b></p> 	<p>Consider how you are working with Council services or services delivered by other organisations or groups in our communities.</p> <p><b>The proposed NEETs strategy carries a significant focus on collaborative/partnership working and identifies such activity as pivotal to success. Examples of collaboration are detailed in the body of the report</b></p>
<p><b>Involvement</b></p> 	<p>Consider how you involve people who have an interest in this proposal and ensure that they represent the diversity of our communities.</p> <p><b>Above all, the Youth Service is one of Participation – the service delivers youth work <i>with</i> the involvement of young people, rather than <i>for</i> them or <i>to</i> them. This approach now needs to be strengthened from the point of view of involving those at risk of becoming NEET and to give them a voice via our existing participation arrangements.</b></p>

## 6. Well-being of Future Generations (Wales) Act 2015

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p><b>A Prosperous Wales</b>  <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>Efficient use of resources, skilled, educated people generates wealth and provides jobs  <b>The NEETs strategy supports the effective education of young people and the development of appropriate types of skills, wherever the development of these lay.</b></p>
<p><b>A Resilient Wales</b>  <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)  <b>No specific contribution.</b></p>
<p><b>A Healthier Wales</b>  <i>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>People's physical and mental well-being is maximised and health impacts are understood  <b>The resolution of NEETs-related issues often involves the improvement of young people's health and the strategy underlines this as a key ambition. Youth workers will engage more with young people in outdoor locations across the County Borough in the future, taking advantage of appropriate opportunities for engaging young people in physical and sporting activities.</b></p>
<p><b>A More Equal Wales</b>  <i>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)</i></p>	<p>People can fulfil their potential no matter what their background or circumstances. This includes the protected characteristics listed in Q2 above. Also consider the cumulative impacts.  <b>The Youth Service carries specific responsibilities in terms of assisting young people to reach their potential and addresses socio-economic challenge, enabling young people to thrive more educationally, be more integrated into their communities and to make a successful transition to adulthood: The proposed NEETs strategy supports the sharing of this approach with wider services.</b></p>

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<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p><b>A Wales of Cohesive Communities</b>  <i>Attractive, viable, safe and well-connected communities</i></p>	<p>Communities are attractive, viable, safe and well connected.</p> <p><b>Yes. Community cohesion is a discrete aspect of youth work/NEETs work, including with specific regard to crime and anti-social behaviour reduction. will allow for the greater and more positive influence of youth workers in the wider area by means of either ‘detached’ work (where they will work with residents, the Police and others to identify locations of need), ‘virtual’ work (utilising social media and other online opportunities for engagement with young people) or occasional building based work in shared locations</b></p>
<p><b>A Wales of Vibrant Culture and Thriving Welsh Language</b>  <i>A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation</i></p>	<p>Culture, heritage and the Welsh language are promoted and protected. People are encouraged to participate in sport, art and recreation.</p> <p><b>The financial advantages represented by more vocationally engaged young people are obvious and the criteria for success contained within this strategy support achievement in this area.</b></p>
<p><b>A Globally Responsible Wales</b>  <i>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</i></p>	<p>Taking account of impact on global well-being when considering local social, economic and environmental well-being.</p> <p><b>The membership and mechanisms of the Youth Service’s Junior and Youth Forums, especially active via the adoption of related annual priorities, will be more available to more young people who are NEET/potentially NEET, who will have the opportunity to contribute to related strands of work and influence.</b></p>

## 7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) [insert link to WL Commissioners Policy Making Standards Guidance](#)



Requirement	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view? <i>e.g the WESP, TAN20, LDP, Pupil Level Annual School Census</i>
<p><b>Links with Welsh Government's <a href="#">Cymraeg 2050 Strategy</a> and CCBC's <a href="#">Five Year Welsh Language Strategy 2017-2022 and the Language Profile</a></b></p>	<p>Positive: The service will benefit from the adoption of the strategy, allowing for the expansion of its Welsh language youth work arrangements amongst the NEETs community and challenge any barrier to EET that may be linked to Welsh language issues.</p>		<p>Views endorsed via the Youth Service's Welsh medium youth work partnership with Urdd Gobaith Cymru and Caerffili Menter Iaith</p>
<p><b>Compliance with the <a href="#">Welsh Language Standards</a>.</b> <i>Specifically Standards 88 - 93</i></p>	<p>The corresponding expansion of the Service's Welsh language youth work offer will see additional NEETs support available in the medium of Welsh, activity that complies with Welsh language standards, not limited to standards 88-93 in terms of widening opportunities for young people to enhance their Welsh language skills</p>	<p>Ensure correspondence and details on the website is bilingual even if the proposal has no impact on the Welsh language e.g road resurfacing works</p>	<p>Views endorsed via the Youth Service's Welsh medium youth work partnership with Urdd Gobaith Cymru and Caerffili Menter Iaith</p>
<p><b>Opportunities to promote the Welsh language</b> <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	<p>Actively encourage and promote the use of our services in Welsh to see an increase in demand over time An expansion of Welsh youth work NEETs provision will widen</p>		<p>Views endorsed via the Youth Service's Welsh medium youth work partnership with Urdd Gobaith</p>

	opportunities for the use of Welsh in an educational context.		Cymru and Caerffili Menter Iaith
<b>Opportunities for persons to use the Welsh language</b> <i>e.g. staff, residents and visitors</i>	The rights of Welsh speakers to use Welsh when dealing with the council and for staff to use Welsh at Work As above – the Welsh language and related aspects will have the opportunity to feature more prominently in the delivery of NEETs-related youth work than is currently the case.		Views endorsed via the Youth Service’s Welsh medium youth work partnership with Urdd Gobaith Cymru and Caerffili Menter Iaith
<b>Treating the Welsh language no less favourably than the English language</b>	As above		Views endorsed via the Youth Service’s Welsh medium youth work partnership with Urdd Gobaith Cymru and Caerffili Menter Iaith

**7a. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and b) treating the Welsh language no less favourably than the English language.**

Yes – this proposal supports the wider delivery of youth work in the medium of Welsh.

## 8. Data and Information

*(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants’ reports etc.)*

<b>Data/evidence</b> <i>(Please provide link to report if appropriate)</i>	<b>Key relevant findings</b>	<b>How has the data/evidence informed this proposal?</b>
What data / evidence was used? Provide links to any reports if appropriate e.g.	What were the key findings? What did the data / evidence used tell you?	Click or tap here to enter text. <b>The recorded types and levels of vulnerability of</b>

**Consultation on the content and direction of the proposed NEETs strategy has been in motion for some time, with participating agencies within the Engagement and Progression framework structure indicating necessary refinements in the collective approach.**

**Throughout the pandemic period, CCBC has engaged with young people via a variety of means, including direct communication with the Council Leader to express their views on educational services – these views are incorporated into the draft document. Young people have for some time commented on the need to expand youth work delivery methodology in order to reach young people – that consultation was not specific to the support of NEETs but the education data unit has access to considerable NEETs-related data across a number of years, as well as accompanying, more general but related schools data.**

**Specific consultation is under way as a consequence of the presentation of this report, including with practitioners and young people and the results of this will be incorporated previous to publication.**

pupils suggest levels of need and demand that require strategic change. Though the NEETs incidence performance profile for the past 6 years (Careers Wales) in Caerphilly signals overall improvement, the recent global pandemic has resulted in further disengagement between schools and vulnerable, suggesting that contributing agencies will need to maximise their focus on this issue in future.

**Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?**

*Details of further consultation can be included in Section 9.*

Are there any gaps in the existing data and how will you go about filling these gaps?

There are no perceived gaps with regards to any further evidence required to further this proposal

## 9. Consultation

*(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, [The Gunning Principles](#) must be adhered to. Consider the [Consultation and Engagement Framework](#). Please note that this may need to be updated as the proposal develops and to strengthen the assessment.*

Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.

Who was consulted?

The consultation process with young people is ongoing (and permanent) and the relevant youth work and other partner teams who engage with NEET/potentially NEET young people have all contributed to the development of the proposed strategy.

How have the consultation findings been taken into account?



## 10. Monitoring and Review

How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?	For example, what monitoring will be used? How frequent? Via the Youth Service's internal Quality Performance management system and the Education Directorate's Service Improvement Plan monitoring processes and Corporate Performance management measures.
What are the practical arrangements for monitoring?	For example, who will put this in place? When will it start? NEETs-related Youth Work delivery will be subject to statistical measure and observation of quality of delivery.
How will the results of the monitoring be used to develop future proposals?	Experiences arising from the implementation of this proposal will inform the development of NEETs engagement arrangements across the County Borough.
When is the proposal due to be reviewed?	N/A
Who is responsible for ensuring this happens?	N/A

## 11. Recommendation and Reasoning

<input checked="" type="checkbox"/>	Implement proposal with no amendments
<input type="checkbox"/>	Implement proposal taking account of the mitigating actions outlined
<input type="checkbox"/>	Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage

Have you contacted relevant officers for advice and guidance?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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## 12. Reason(s) for Recommendation

*(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the "Summary of Integrated Impact Assessment" section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).*

The identification and support of NEET young people is a core activity for a wide range of services and institutions within Caerphilly County Borough. Though there have been significant and positive developments in terms of engagement and support, the collective focus provided by a NEETs strategy will assist in developing appropriate forms of engagement and intervention.

## 13. Version Control

*(The IIA should be used in the early stages of the proposal development process. The IIA can be strengthened as time progresses to help shape the proposal. The Version Control section will act as an audit trail to evidence how the IIA has been developed over time)*

Version No.	Author	Brief description of the amendments/update	Revision Date

## Integrated Impact Assessment Author

Name:	Paul O'Neill
Job Title:	Senior Youth Service Manager
Date:	26/5/21

## Head of Service Approval

Name:	Paul Warren		
Job Title:	Lead Officer for School Improvement.		
Signature:		Date:	