



Caerphilly County Borough Council - Integrated Impact Assessment

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
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Welsh Language (Wales) Measure 2011
- 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.

1. Proposal Details

Lead Officer:- Sarah Ellis

Head of Service:- Keri Cole

Service Area and Department:-Education

Date:-14.2.23

NB* PLEASE NOTE THAT THIS PROPOSAL NO LONGER FORMS PART OF PLANNED BUDGET FOR 2023/2024

What is the proposal to be assessed? *Provide brief details of the proposal and provide a link to any relevant report or documents.*

Up to a 10% reduction of Caerphilly's funding contribution the regional sensory service for children with hearing, impairment, visual impairment and complex speech and language needs (SENCOM).

The total budget from all local authorities across the region to SENCOM is currently £2.43 million. Caerphilly's contribution to the Service equates 32% based on pupil population, and is the biggest proportion across the 5 Local Authorities A 10% reduction on Caerphilly's 2022/23 contribution to the shared service equates to £78.4k.

It is recognised that around 13% of SENCOM costs are linked to non-staffing costs and accommodation.

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 characteristics**.*

2a Age (people of all ages)

(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

The proposal sought to realise savings by focusing on efficiencies and non-staffing costs where possible. This potentially meant the use of more cost-effective council assets than the current provision, reductions in some non-staffing budgets, the potential use of vacancy management as well as the exploration of some new ways of delivering services. Should the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly.



(ii) If there are negative impacts how will these be mitigated?

Any negative impacts mitigations would have been potential use of more council assets as well as the exploration of some new ways of delivering services for example adopting a more agile approach, consultative methodologies and opportunities for different models of engagement. Should the levels of savings proposed risk a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly.

(iii) What evidence has been used to support this view?

The sensory needs service (SENCOM) provides for children with complex sensory needs and an identified additional learning needs (ALN). In line with the ALN Act and the Equality Act the Local Authority (LA) has a statutory responsibility to identify and meet ALN needs.

2b Disability *(people with disabilities/ long term conditions)*

(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

As above

(ii) If there are negative impacts how will these be mitigated?

As above

(iii) What evidence has been used to support this view?

As above



2c Gender Reassignment (*anybody whose gender identity or gender expression is different to the sex they were assigned at birth*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

As above if these characteristics are relevant

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

As above

2d Marriage or Civil Partnership (*people who are married or in a civil partnership*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

- (iii) What evidence has been used to support this view?

2e Pregnancy and Maternity (*women who are pregnant and/or on maternity leave*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

- (iii) What evidence has been used to support this view?



2f Race (*people from black, Asian and minority ethnic communities and different racial backgrounds*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

As above if these characteristics apply

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

As above

2g Religion or Belief (*people with different religions and beliefs including people with no beliefs*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

As above

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

As above

2h Sex (*women and men, girls and boys and those who self-identify their gender*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

As above

- (ii) If there are negative impacts how will these be mitigated?

As Above

- (iii) What evidence has been used to support this view?

As above



2i Sexual Orientation (*lesbian, gay, bisexual, heterosexual, other*)

- (i) **Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As above if these characteristics apply

- (ii) **If there are negative impacts how will these be mitigated?**

As above

- (iii) **What evidence has been used to support this view?**

As above

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 group 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

3a Low Income / Income Poverty *(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)*

(i) Does the proposal have any positive, negative or neutral impacts on the following and how?

The proposal sought to realise savings by focusing on efficiencies and non-staffing costs where possible as outlined above. Had the levels of savings proposed risk a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly to mitigate against any impact for those in poverty.

(ii) If there are negative impacts how will these be mitigated?

As above

What evidence has been used to support this view?

As above



3b 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)*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

3c 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.)*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

As above

3d Area Deprivation *(where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?)*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

As above



3e Socio-economic Background *(social class i.e. parents education, employment and income)*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As Above

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

As above

3f Socio-economic Disadvantage *(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) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above.

- (ii) If there are negative impacts how will these be mitigated?

As above

- (iii) What evidence has been used to support this view?

As above



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

Objective 1 - Improve education opportunities for all

The LA works in partnership with all schools and education providers to ensure that the needs of vulnerable children and those with ALN are appropriately identified and provision is in place in line with the ALN Act.

The proposal sought to realise savings by focusing on efficiencies and non-staffing costs where possible. Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly. This would help to ensure the needs of complex learners were met and access to appropriate educational opportunities was not compromised.

Objective 2 - Enabling employment

Improved educational outcomes are linked to improved employment prospects. Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly thus ensuring the needs of complex learners were met, thus mitigating any risk.

Objective 3 - 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

NA

Objective 4 - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment

Na

Objective 5 - 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

NA



Objective 6 - Support citizens to remain independent and improve their well-being

Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly thus ensuring the needs of complex learners were met, thus mitigating any risk.

4a. Links to any other relevant Council Policy *(How does your proposal deliver against any other relevant Council Policy)*

Strategic Equality Plan 2020-2024

Education Strategy

Corporate Plan



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

How have you used the Sustainable Development Principles in forming the proposal?

Long Term

In order for the Council to achieve a balanced budget and provide the best service there is a need to consider funding across the whole Council and prevent disproportionate funding reductions across areas of service.

Supporting partnerships working to identify learning needs and promote wellbeing of children at the centre of everything we do. Promoting positive relationships, early intervention and the use of appropriate strategies to support learner needs within their settings is crucial to the effective implementation of a sustainable model.

Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly thus ensuring the needs of complex learners were met, thus mitigating any risk.

Prevention

Working collaboratively to implement effective intervention strategies is essential in meeting needs. Had the levels of savings proposed risk a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly thus ensuring the needs of complex learners are met, and supporting the service to continue.



Integration

A reduction in service may impact on other services such as speech and language therapy services, local authority services such as educational psychology, and may lead to requests for specialist support or specialist placements. Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly thus ensuring the needs of complex learners were met, thus mitigating any risk.

Collaboration

Working collaboratively with schools, other education settings, other agencies such as health and social care, and parents / carers provides a more cohesive approach to identification of need and ensures appropriate intervention. Any reduction of service creates risk. Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly thus ensuring the needs of complex learners were met, thus mitigating any risk. This would mitigate any risk and enable the regional service to remain in place and continue to work with schools and Inclusion Services to ensure that service users will be supported.

Involvement

The consultation for a reduction in funding from Caerphilly Council was part of the public consultation pack which is part of wider council budget saving proposals. This allows for stakeholder feedback before a decision is made. Further consultation regarding a reduction in service needs to be developed by the regional service, working in collaboration with the local authorities and stakeholders in order to further identify and mitigate against risks.



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

Does the proposal maximise our contribution to the Well-being Goals and how?

A Prosperous Wales

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

Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly. This would contribute to ensuring the needs of complex learners are met, thus mitigating any risk linked to longer term implications for independence, wellbeing, skills development and employment opportunities.



A Resilient Wales

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)

NA

A Healthier Wales

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

had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly. This would contribute to ensuring the needs of complex learners are met, thus mitigating any risk linked to longer term implications for independence and wellbeing.

A More Equal Wales

A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)

Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly. This would contribute to ensuring the needs of complex learners are met, thus mitigating any risk linked to longer term implications for educational outcomes and for young people fulfilling their potential.

A Wales of Cohesive Communities

Attractive, viable, safe and well-connected communities

Had the levels of savings proposed risk a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly. This would contribute to ensuring the needs of complex learners are met, thus mitigating any risk linked to longer term implications for people's wellbeing, feeling safe and connected.

A Wales of Vibrant Culture and Thriving Welsh Language

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



All schools are required to promote Welsh culture and heritage through the Cwricwlwm Cymreig

A Globally Responsible Wales

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

Had the levels of savings proposed risked a reduction in the capacity of services delivered to children with complex additional learning needs then the savings levels would have needed to be reduced accordingly. This would contribute to ensuring the needs of complex learners are met, thus mitigating any risk linked to longer term implications.

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) Policy Making Standards - Good Practice Advice Document

7a. Links with Welsh Government's Cymraeg 2050 Strategy and CCBC's Five Year Welsh Language Strategy 2022-2027 and the Language Profile

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral

- (ii) If there are negative impacts how will these be mitigated?

- (iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

7b. Compliance with the Welsh Language Standards. *Specifically Standards 88–93*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral

- (ii) If there are negative impacts how will these be mitigated?

- (iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*



7c. Opportunities to promote the Welsh language *e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral

- (ii) If there are negative impacts how will these be mitigated?

- (iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

7d. Opportunities for persons to use the Welsh language *e.g. staff, residents and visitors*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral

- (ii) If there are negative impacts how will these be mitigated?

- (iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

7e. Treating the Welsh language no less favourably than the English language

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral

- (ii) If there are negative impacts how will these be mitigated?

- (iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

- 7f. 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.

NA

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.)

Data/evidence *(Please provide link to report if appropriate)*

Case load data, referral information and working practices. Results of the budget consultation and wider engagement with stakeholders and partners. The public consultation showed that a number of people consider the proposal to be one which they particularly disagreed with. In addition, the face-to face- consultation exercises tended to show that respondents were not in agreement with any cuts to services that support vulnerable individuals, particularly children with disabilities.

Key relevant findings

See above

How has the data/evidence informed this proposal?

Consultation and engagement with stakeholder and partners means that this proposal is no longer part of budget planning for 2023/2024.

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.*

No.

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?

Consultation has been undertaken to date with SEWC Directors, Inclusion Leads and Finance Officers. The public consultation showed that a number of people consider the proposal to be one which they particularly disagreed with. In addition, the face-to face- consultation exercises tended to show that respondents were not in agreement with any cuts to services that support vulnerable individuals, particularly children with disabilities.

When they were consulted did the consultation take place at the formative stage and was adequate time given for consultees to consider and respond?

The budget consultation took place between 18.1.23 and the 9.2.23 due to the late notification of the settlement from Welsh Government and to allow time for the results to be analysed before final reports.

Was sufficient information provided to consultees to allow them to make an informed decision on the proposal?

A report was provided by the Head of the Sensory Service.

What were the key findings?

Stakeholder consultees are in agreement to consider savings proposals. The wider public tended to disagree with the proposal.

How have the consultation findings been taken into account?

Used to develop the recommendations.



10. Monitoring and Review

How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?

Through the LA hosting the regional service, the Partnership Board of SENCOM and through reports to Directors.

What are the practical arrangements for monitoring?

Monitoring and evaluation by the SENCOM service.

How will the results of the monitoring be used to develop future proposals?

As above

When is the proposal due to be reviewed?

SEWC Directors are reconsidering proposals in February 2023.

Who is responsible for ensuring this happens?

SENCOM Service and Directors.

11. Recommendation and Reasoning

- Not to implement the proposal for the 2023/2024 financial year

Have you contacted relevant officers for advice and guidance?

- Yes

12. Reason(s) for Recommendations

(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 proposal focussed on efficiencies and non-staffing costs. While the proposal recognised that further consideration and consultation would be required regarding mitigation of risk before a final



agreement were made, the decision has been taken not to proceed with this proposal for the 2023/2024 financial year.

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) (Add or delete versions as applicable)

➤ Version 1

Author:- Sarah Ellis

Brief description of the amendments/update:-

Explanations and mitigations expanded.

Revision Date:-17.1.23

➤ Version 2

Author:- Sarah Ellis

Brief description of the amendments/update:-

Further consideration given to context and mitigations

Revision Date:-25.1.23

➤ Version

Author:- Kathryn Peters

Brief description of the amendments/update:-

Inclusion of public consultation results and decision not to proceed.

Revision Date:-14.2.23



Integrated Impact Assessment Author

Name:- Sarah Ellis

Job Title:- Lead for Inclusion and ALN

Date:-25.1.23

Head of Service Approval

Name:- Keri Cole

Job Title:- Chief Education Officer

Signature:-

A handwritten signature in dark ink, appearing to read 'K Cole', is written over a light blue grid background.

Date:-14.2.23