

## **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
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles
- Well-being of Future Generations (Wales) Act 2015
- Welsh Language (Wales) Measure 2011

**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.

**PLEASE NOTE:** Overwrite any grey text, it is there to guide you. Make sure the font colour is converted to black for accessibility reasons.

### **1. Proposal Details**

<b>Lead Officer</b>	<b>Head of Service</b>	<b>Service Area &amp; Department</b>	<b>Date</b>
Anwen Cullinane / Kath Peters	Sue Richards	Policy and Business Improvement – Equalities and Welsh Language	10/01/2024

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

20% reduction to the Equalities and Welsh Language Training Budget. This equates to £3647 less to spend on training courses for staff.

It is a statutory requirement for the Council to deliver equalities and Welsh language training to staff in accordance with the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Welsh Language (Wales) Measure 2011.

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#### **Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011**

- Staff Training – promote knowledge and understanding of the Equality Act 2010, the Public Sector Equality Duty and the specific duties in Wales. Use performance assessment procedures to identify and address the training needs of staff

#### **Welsh Language (Wales) Measure 2011**

- **Welsh Language Standard 128 -**

You must provide training in Welsh in the following areas, if you provide such training in English –

- (a) recruitment and interviewing;
- (b) performance management;
- (c) complaints and disciplinary procedures;
- (ch) induction;
- (d) dealing with the public; and
- (dd) health and safety.

- **Welsh Language Standard 129 –**

You must provide training (in Welsh) on using Welsh effectively in –

- (a) meetings;
- (b) interviews; and
- (c) complaints and disciplinary procedures.

- **Welsh Language Standard 130 –**

You must provide opportunities during working hours –

- (a) for your employees to receive basic Welsh language lessons, and
- (b) for employees who manage others to receive training on using the Welsh language in their role as managers.

- **Welsh Language Standard 131 –**

You must provide opportunities for employees who have completed basic Welsh language training to receive further training free of charge, to develop their language skills.

- **Welsh Language Standard 132 –**

You must provide training courses so that your employees can develop –

- (a) awareness of the Welsh language (including awareness of its history and its role in Welsh culture);
- (b) an understanding of the duty to operate in accordance with the Welsh language standards;
- (c) an understanding of how the Welsh language can be used in the workplace.

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This training budget is also used to deliver bespoke equalities and Welsh language training required by service areas following a complaint or to address a service need.

The Equalities and Welsh Language Training Budget is also used to fund British Sign Language Training for staff to learn BSL skills to enable us to deliver services to the Deaf Community.

Last year (2022-2023) this budget paid for Accessibility and Easy Read Training courses for staff following the inception of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (the ‘accessibility regulations’).

In the last 3 years we have not spent the full allocation of training budget, although for 2022-2023 there was less than £1000 left.

## 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> )	<b>Negative</b> – a reduction in training budget will lead to less money to deliver training to upskill staff on equalities matters.  Reduced skills and knowledge of equalities requirements leaves the Council open to legal and financial challenges	Less training will be delivered with less training money available. We will have to prioritise the training we must provide in line with legislation and focus that training to frontline staff in the first instance.	Previous use of the budget.
<b>Disability</b> ( <i>people with disabilities/ long term conditions</i> )	See above.	See above.	See above.
<b>Gender Reassignment</b> ( <i>anybody who’s gender identity or gender expression is different to the sex they were assigned at birth</i> )	See above.	See above.	See above.
<b>Marriage or Civil Partnership</b> ( <i>people who are married or in a civil partnership</i> )	See above.	See above.	See above.

<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>Pregnancy and Maternity</b> ( <i>women who are pregnant and/or on maternity leave</i> )	See above.	See above.	See above.
<b>Race</b> ( <i>people from black, Asian and minority ethnic communities and different racial backgrounds</i> )	See above.	See above.	See above.
<b>Religion or Belief</b> ( <i>people with different religions and beliefs including people with no beliefs</i> )	See above.	See above.	See above.
<b>Sex</b> ( <i>women and men, girls and boys and those who self-identify their gender</i> )	See above.	See above.	See above.
<b>Sexual Orientation</b> ( <i>lesbian, gay, bisexual, heterosexual, other</i> )	See above.	See above.	See 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 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>	Not applicable – although some of the training delivered covers socio-economic issues.	Not applicable	Not applicable
<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>	See above.	See above.	See above.

<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>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> )	See above.	See above.	See above.
<b>Area Deprivation</b> ( <i>where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?</i> )	See above.	See above.	See above.
<b>Socio-economic Background</b> ( <i>social class i.e. parents education, employment and income</i> )	See above.	See above.	See above.
<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> )	See above.	See above.	See 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?) [Corporate Plan](#)*

<b>Objective 1 - Enabling our Children to Succeed in Education</b>	Not applicable
<b>Objective 2 - Enabling our Residents to Thrive</b>	Upskilling staff about equalities and Welsh language matters ensures that we are delivering services in an inclusive and accessible way.
<b>Objective 3 - Enabling our Communities to Thrive</b>	Not applicable
<b>Objective 4 - Enabling our Economy to Grow</b>	Not applicable
<b>Objective 5 - Enabling our Environment to be Greener</b>	Not applicable

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

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

Corporate Plan 2023-2028

[Strategic Equality Plan 2020-2024](#)






[Workforce Development Strategy 2021-2024](#)

[Five Year Welsh Language Strategy 2022-2027](#)



## 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>A reduction in the equalities and Welsh language Training budget will lead to less training to upskill staff about equalities and Welsh language matters. Long-term this could have a detrimental impact on how the Council delivers inclusive and accessible services. To manage the budget reduction, we will prioritise training to front-line staff in the first instance and deliver training courses on what is considered the minimum requirement, in accordance with the relevant legislation mentioned in Section 2 and policies listed in Section 4a.</p>
<p><b>Prevention</b></p> 	<p>We will look at cost-effective ways of delivering the minimum requirement of training required in line with the relevant legislation. Training however will be prioritised however to front-line staff in the first instance.</p>
<p><b>Integration</b></p> 	<p>We will look at cost-effective ways of delivering the minimum requirement of training required in line with the relevant legislation. Training however will be prioritised however to front-line staff in the first instance.</p>
<p><b>Collaboration</b></p> 	<p>We will look at cost-effective ways of delivering the minimum requirement of training required in line with the relevant legislation. Training however will be prioritised however to front-line staff in the first instance.</p>
<p><b>Involvement</b></p> 	<p>We will look at cost-effective ways of delivering the minimum requirement of training required in line with the relevant legislation. Training however will be prioritised however to front-line staff in the first instance.</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>Where possible we use local training providers to ensure that the money the Council spends on training is retained in the local economy as far as possible.</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>Not applicable</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>Not applicable</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>Less training will inevitably be delivered with less training money available. We would have to look and prioritise the training we must provide in line with legislation and focus that training to frontline staff in the first instance.</p>

<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>Less training will be delivered with less training money available. We would have to look and prioritise the training we must provide in line with legislation and focus that training to frontline staff in the first instance.</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>Less training will be delivered with less training money available. We would have to look and prioritise the training we must provide in line with legislation and focus that training to frontline staff in the first instance.</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>Not applicable.</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) [Policy Making Standards - Good Practice Advice Document](#)



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? e.g the WESP, TAN20, LDP, Pupil Level Annual School Census
<b>Links with Welsh Government's <a href="#">Cymraeg 2050 Strategy</a> and CCBC's <a href="#">Five Year Welsh Language Strategy 2022-2027</a> and the <a href="#">Language Profile</a></b>	<p><b>Negative</b> – a reduction in training budget will lead to less money to deliver training to upskill staff on Welsh language matters.</p> <p>Reduced skills and knowledge of Welsh language requirements leaves the Council open to legal and financial challenges.</p>	<p>Less training will be delivered with less training money available. We will have to prioritise the training we must provide in line with legislation and focus that training to frontline staff in the first instance.</p>	<p>Previous use of the budget.</p>
<b>Compliance with the <a href="#">Welsh Language Standards</a>.</b> <i>Specifically Standards 88–93</i>	<p>See above.</p>	<p>See above.</p>	<p>See above.</p>
<b>Opportunities to promote the Welsh language e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</b>	<p>See above.</p>	<p>See above.</p>	<p>See above.</p>
<b>Opportunities for persons to use the Welsh language e.g. staff, residents and visitors</b>	<p>See above.</p>	<p>See above.</p>	<p>See above.</p>

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>
Treating the Welsh language no less favourably than the English language	See above.	See above.	See above.

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.
<p>We will have to prioritise the training we must provide in line with legislation and focus that training to frontline staff in the first instance.</p> <p>We will look for opportunities to deliver the most cost-effective training and will work in collaboration with the National Learn Welsh centre, WLGA and local authority partners, to ensure that we are meeting our legal requirements.</p>

## 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>
<p>In the last 3 years we have not spent the full allocation of training budget, although for 2022-2023 there was less than £1000 left.</p> <p>We will look at cost-effective ways of delivering training about equalities and Welsh language matters by prioritising training opportunities to front line staff in the first instance.</p> <p>Further data / evidence will be sought as part of the Budget Savings Proposals public consultation exercise and the impact assessment will be updated in due course.</p>	<p>Not applicable at this point.</p>	<p>Not applicable at this point.</p>

<b>Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?</b> <i>Details of further consultation can be included in Section 9.</i>
<p>Not applicable at this point.</p>

## 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.**

**Update following a period of public consultation:**

**The council's public consultation on the draft budget proposals for 2024/25 ran from Monday 22<sup>nd</sup> January 2024 until Tuesday 13<sup>th</sup> February 2024.**

**Residents and other stakeholder groups were invited to offer their views on the proposals in a number of ways. This included a survey (available online and in paper formats), attending face-to-face engagement sessions, using the council's online digital engagement platform and targeted stakeholder engagement with potentially impacted groups.**

**337 responses to the consultation were received by the closing date. A low response rate such as this comes with the caveat of self-selecting bias in the response and local media has focused attention on a small number of issues.**

**Face-to face conversations have had low levels of attendance (less than 10 visitors per session) with the exception of Caerphilly where over 40 people attended. A meeting was held with 9 Viewpoint Panel members and one person attended an online drop-in session.**

**The full consultation feedback report will be available at [Council Budget Setting 2024-2025 | The Caerphilly Conversation](#)**

## 10. Monitoring and Review

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

The training budget allocation will be monitored on an ongoing basis and training opportunities made available to front-line staff in the first instance, and ensuring the expenditure remains within budget.

<b>What are the practical arrangements for monitoring?</b>	The training budget allocation will be monitored on an ongoing basis and training opportunities made available to front-line staff in the first instance, and ensuring the expenditure remains within budget.
<b>How will the results of the monitoring be used to develop future proposals?</b>	We will look at trends on what equalities and Welsh language training is required, but some of this will be determined by complaints or as a result of any future Equality and Human Rights Commission interventions, Welsh Language Commissioner Investigations, or Tribunal Outcomes which then identify training needs.
<b>When is the proposal due to be reviewed?</b>	The proposal is intended to be fully implemented from the 1 <sup>st</sup> April 2024
<b>Who is responsible for ensuring this happens?</b>	The proposal is intended to be fully implemented from the 1 <sup>st</sup> April 2024



### 11. Recommendation and Reasoning

<input type="checkbox"/>	Implement proposal with no amendments
<input checked="" 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  No

### 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 proposal is to implement a 20% reduction to the Equalities and Welsh Language Training Budget. This equates to £3647 less to spend on training in the coming financial year.

It is a statutory requirement for the Council to deliver equalities and Welsh language training to staff in accordance with the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Welsh Language (Wales) Measure 2011.

Reduced skills and knowledge of equalities and Welsh language requirements may leave the Council open to legal and financial challenges.

It is inevitable that less training will be delivered with less training money available. However, to manage the reduction, we will prioritise the training we must provide in line with legislation and focus that training to frontline staff in the first instance. The training budget will be monitored on an ongoing basis, ensuring the expenditure remains within budget. We will look for opportunities to deliver the most cost-effective training and will work in collaboration with the National Learn Welsh centre, WLGA and local authority partners, to ensure that we are meeting our legal requirements.

### 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
1	Anwen Cullinane	Draft 1	10/01/2024
2		Updated to incorporate feedback from public consultation	15/02/2024

#### *Integrated Impact Assessment Author*

<b>Name:</b>	<b>Anwen Cullinane</b>
<b>Job Title:</b>	<b>Senior Policy Officer - Equalities and Welsh Language</b>
<b>Date:</b>	<b>10/01/2024</b>

#### *Head of Service Approval*

<b>Name:</b>	<b>Sue Richards</b>
<b>Job Title:</b>	<b>Head of Transformation</b>
<b>Date:</b>	<b>10/01/2024</b>
<b>Signature</b>	<b>S Richards</b>