

# Fairness and Equalities Impact Assessment (FEIA)

This integrated impact assessment aims to ensure Newport City Council makes fair decisions, considers relevant evidence, and seeks to secure the best outcomes for our communities. **A FEIA must be used to inform the first steps of decision-making at the concept stage, not when a decision is already made or cannot be influenced.** This impact assessment considers our legislative responsibilities under:

- The Equality Act 2010, including the Socio-economic Duty
- The Welsh Language (Wales) Measure 2011
- The Well-being of Future Generations (Wales) Act 2015
- The Armed Forces Act 2021

## What do we mean by Fairness?

The Newport Fairness Commission is an independent body which advises the council on the best use of resources and powers to achieve the fairest outcomes for local people. The Fairness Commission has established four **Principles of Fairness** which should be considered as part of any decisions that the council make – the questions below are useful to reflect on before you start your FEIA.

- **Equity**
  - Are people being treated in a consistent way, whilst acknowledging their differences (for example, need, barriers to accessing services)?
  - Will the gap between those with more, and those with less be reduced?
  - Have the interests of different groups affected (including minority or disadvantaged communities) been taken into account?
- **Priority**
  - Have the needs of the most disadvantaged and vulnerable across the city been given priority?
  - Have you considered possible indirect consequences for minority/disadvantaged communities when other priorities are directing decisions?
- **Inclusion**
  - Will the voices of all those affected by your decision be heard?
  - Are people able to participate in and shape a service, as well as receiving it?
  - Have you considered the impact of your decision on the relationship between communities, and the spaces they share?
- **Communication**
  - Are decisions being made transparently and consistently?
  - How will decisions be communicated to people who are affected in a clear way, with the opportunity for feedback?

## Part 1: Identification

<u>Name and Role of Officer</u>	<u>Service Area</u>	<u>Date</u>	<u>Head of Service who approved FEIA</u>
Paul Flint, Performance and Programme Manager	People, Policy & Transformation	2/1/2024	Tracy McKim, Head of People, Policy & Transformation

### 1. What is being assessed? (Please tick on the relevant box(es) as appropriate)

- |   |  |
|---|--|
| <input checked="checked" type="checkbox"/> New or revised policies, practices or procedures (which modify service delivery or employment practices) | <input type="checkbox"/> Local implementation of National Strategy/Plans/ Legislation  |
| <input type="checkbox"/> Service review or re-organisation proposals which affect the community and/or staff  | <input type="checkbox"/> Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans) |
| <input type="checkbox"/> Efficiency or saving proposals   | <input type="checkbox"/> Major procurement and commissioning decisions   |
| <input type="checkbox"/> Setting budget allocations for new financial year and strategic financial planning   | <input type="checkbox"/> Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services  |
| <input type="checkbox"/> Decisions affecting service users, employees or the wider community including (de)commissioning or revising services       | <input type="checkbox"/> Other please explain in the box below:  |
| <input type="checkbox"/> New project proposals affecting staff, communities or access to the built environment                                      | <div></div>  |

### 2. Please describe the overall aims, objectives and intended outcomes of your decision.

The Council's Risk Management Policy is an internal policy document designed to support officers in making effective and evidence-based decisions to maximise the opportunities and manage the risks that may prevent the Council from achieving its objectives and statutory duties.

**3. Who are the main stakeholders who may be impacted by your decision and what data do you hold on them? Consider communities of place (people who live in the same geographic area) and communities of interest (people who share particular characteristics but may live in different geographic areas). Stakeholders may include residents, local businesses, community groups, staff or partners.**

The proposed policy is an internal document for use by the Council's officers and Cabinet Members and Democratic functions. There are no external communities or stakeholders impacted by the implementation of this policy.

## Part 2: Engagement

When completing this section, you need to consider whether you have sufficient information about the views and experiences of people who your decision will impact upon. If you don't, you may need to undertake a period of engagement/consultation before continuing. An FEIA is a live document, so can be updated with consultation findings, and amended as needed during the decision-making process.

The council has a duty to consult and engage with people who may experience inequalities as a result of your decision. This includes people who share Protected Characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation), people who have lived experience of socio-economic disadvantage and members of the Armed Forces community. The council's Youth Promise also requires us to ensure all young people in Newport are listened to and included in decisions affecting them.

The council also has a duty to ensure that any consultation is available bilingually (in Welsh as well as English), and you may like to consider any other community languages that are spoken by people who may be impacted by your decision. Below are some questions that should be included in any public consultation relating to a decision which may impact on the use of Welsh language in Newport:

1. Do you believe that the proposed decision/policy will have a positive or negative effect on opportunities to use the Welsh language?
2. If you think it will have a negative effect, what steps could we take to lessen or remove this and improve positive effects?
3. Do you believe that the proposed decision/policy will treat the Welsh language less favourably than the English language?

### **1. How have you engaged with people who may be affected by your decision (the stakeholders you have identified)?** [More Info](#)

We have engaged with the Council's Cabinet, Senior Leadership Team (Chief Executive, Directors and Heads of Service) and risk management experts from different disciplines in the Council including Internal Audit, Civil Contingencies, Finance, Human Resources, Programme and Project Management, Digital Services, Health & Safety and Insurance.

### **2. What do you know about the views or experiences of people who may be affected by your decision?** [More Info](#)

Not applicable as this is an internal document.

## Part 3: Assessment

This section requires you to assess the potential impact of your decision on a range of groups who may experience specific disadvantages. Your assessment should be supported by evidence – either from your own engagement/consultation, similar or previous engagement, what you already know about the people who access your service, or from local and national sources of information.

Useful documents which set out information about how communities are impacted by inequalities include [EHRC – Is Wales Fairer?](#) and the council's [COVID-19 Community Impact Assessment](#). Your decision may have both positive and negative impacts – if this is the case, please place a cross in both boxes.

### 1. Impact on people that share Protected Characteristics

[Protected Characteristics](#) are defined under the Equality Act 2010, and describe groups of people who are protected from discrimination, either in the workplace, or through the provision of goods and services. The council must consider how decisions may impact on people differently because of a protected characteristic, and how any negative impact could be reduced. National guidance on assessing equality impacts and the Public Sector Equality Duty can be found [here](#). You can also access further advice and examples of positive and negative impacts [here](#).

### 2. Impact on Welsh Language

The Welsh Language (Wales) Measure specifies that for all policy decisions, the council must consider the effects (both positive and negative) on the Welsh language. For further guidance on Welsh language considerations [see here](#).

### 3. Impact on Armed Forces Community (Education, Housing and Healthcare only)

The [Armed Forces Covenant Duty](#) relates to the functions of education, housing and healthcare. It requires the council to pay due regard to the principles of the Armed Forces Covenant and consider the needs of the Armed Forces community when making decisions about the development, implementation or review of a policy or delivery of services.

## Protected Characteristics

Provide further details about the nature of the impact on the following protected characteristics below, considering the Public Sector Equality Duty that the council has to:

1. Promote equal opportunity across different groups
2. Promote community cohesion
3. Help eliminate unlawful discrimination/ harassment/ victimisation

Protected characteristic	Impact:			
	Positive	Negative	Neither	
<b>Age</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.
<b>Disability</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.
<b>Gender Reassignment</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.
<b>Marriage or civil partnership</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.

<b>Pregnancy or maternity</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.
<b>Race</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.
<b>Religion or Belief or non-belief</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.
<b>Sex</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.
<b>Sexual Orientation</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that this proposal will positively or negatively impact people who share this protected characteristic.

## Impact on Welsh Language

The Welsh Language (Wales) Measure specifies that for all policy decisions, the council must consider the effects (both positive and negative) on the Welsh language. For further guidance on Welsh language considerations see [here](#).

	Impact:			
	Positive	Negative	Neither	
<b>Welsh Language</b> <a href="#">More Info</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence to suggest that the proposal policy will positively or negatively impact the Welsh Language or compliance with Welsh Language Standards.

Please describe how you have ensured your engagement has considered the view of Welsh speakers in Newport.

N/a



## Impact on Armed Forces Community

The Armed Forces Community consists of: members of the regular forces and the reserve forces; former members of any of His Majesty's forces ('veterans') who are ordinarily resident in the UK; members of British overseas territory forces who are subject to service law; and [relevant family members](#).

Consider the way your decision impacts the Armed Forces Community and pay due regard to the principles of the Armed Forces Covenant which are:

1. *the unique obligations of, and sacrifices made by, the armed forces.*
2. *the principle that it is desirable to remove disadvantages arising for Service people, as a result of membership of the armed forces*
3. *the principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the armed forces.*

The [statutory guidance gives](#) examples of the kinds of disadvantage a member of the Armed Forces Community may face in accessing education, housing or healthcare.

	Impact:			
	Positive	Negative	Neither	
<b>Armed Forces Community</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/a

## 4. The Sustainable Development Principle

The Well-being of Future Generations Act puts in place a sustainable development principle which helps organisations consider the impact they could have on people living in Wales in the future, and ensure they are focused on tackling long-term challenges. Below, consider how your decision promotes, advances, or contradicts the [5 ways of working](#) which underpin the sustainable development principle. You can access further guidance on considering the sustainable development principle [here](#).

### Long Term



The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.

*We are required to look beyond short term timescales for financial planning and political cycles and instead plan with the longer term in mind (guidance says at least 10 years, but preferably 25). Consider what impact your decision will have on the community in the long term, both for current and future generations.*

The development of the Policy has incorporated the Well-being of Future Generations Act, Local Government and Elections Act as well as risk management best practice. The Policy and supporting appetite statement have been developed in line with the Council's Corporate Plan, strategic priorities and statutory duties. The Policy and supporting processes are embedded into the Council's performance and risk management arrangements which are subject to regular monitoring and reporting through its governance processes.

### Prevention



Putting resources into preventing problems occurring or getting worse

*When developing your decision have you considered what the root causes of the issue are? Are you addressing the root causes and prevent them from occurring or getting worse?*

The Risk Management Policy will enable the Council to effectively identify, assess and ensure robust arrangements are in place to mitigate and prevent new, emerging and existing opportunities and risks. The Policy and risk appetite statement will ensure decisions are based upon the best available data and evidence to ensure necessary actions are taken to reduce and prevent incidents. Service areas will continuously monitor and report on the management of risk through its existing governance arrangements.

## Integration



Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.

*Consider how your decision impact on the Well-being Goals for Wales, the council's Well-being Objectives or Well-being Objectives from other organisations. It is important to use the hyperlinks to ensure you understand the definitions of each of the goals, and taking steps to meet one well-being goal / objective should not be at the detriment of other well-being goals / objectives).*

### [Wales' Well-being Goals](#)

- A prosperous Wales
- A healthier Wales
- A Wales of more cohesive communities
- A resilient Wales
- A more equal Wales
- A Wales of vibrant culture an thriving Welsh Language
- A globally responsible Wales

### [Newport City Council's Well-being Objectives](#)

- Newport is a thriving and growing city that offers excellent education and aspires to provide opportunities for all.
- Newport is a city that seeks to protect and enhance our environment whilst reducing our carbon footprint and preparing for a sustainable and digital future.
- Newport is a supportive city where communities and care are at the heart of what we do.
- Newport City Council is an inclusive organisation that places social value, fairness, and sustainability at its core.

The development of the Policy has incorporated the Well-being of Future Generations Act, Local Government and Elections Act as well as risk management best practice. The Policy and supporting appetite statement have been developed in line with the Council's Corporate Plan, strategic priorities and statutory duties. The Policy and supporting processes are embedded into the Council's performance and risk management arrangements which are subject to regular monitoring and reporting through its governance processes.

## Collaboration



Working together to deliver objectives.

*Have you considered how acting in collaboration with any other person, organisation or any other part of our organisation could help meet this proposal and meet our well-being objectives?*

The development of the risk management policy has been developed in collaboration with Cabinet, Senior Leadership Team and risk management experts within the Council. The Council has also considered risk management best practice from the UK Government, Institute of Risk Management, Institute of Internal Auditors and the COSO Treadway Commission.

## Involvement



Involving those with an interest and seeking their view - ensuring that those people reflect the diversity of the area.

*Who are the stakeholders who will be affected by your proposal? Have they been involved? Do you plan to involve them in the future? Do those people reflect the diversity of the area which is served?*

The Council has involved key stakeholders from across Newport City Council to inform and support the development of the Policy. The Council will also involve the Governance and Audit Committee to review and provide feedback on the proposed Policy. The views of the committee, officers and Cabinet will support the development and implementation of the Policy.

## 5. Socio-economic Duty

The [Socio-economic Duty](#) is set out in the Equality Act 2010, and requires the council, when making strategic decisions, to pay due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage. Inequalities of outcome are felt most acutely in areas such as health, education, work, living standards, justice and personal security, and participation.

A 'strategic decision' is defined by Welsh Government as a decision **which affects how the council fulfills its statutory purpose over a significant period of time and does not include routine 'day to day' decisions**. Strategic decisions include:

- Corporate plans
- Setting well-being, equality and other strategic objectives
- Changes to, or development of public services
- Strategic financial planning
- Strategic policy development

If you do not think your decision meets this definition, and you do not plan on carrying out a Socio-economic Duty Assessment in this section, please provide your rationale below. Any decision which is presented to a Cabinet Member, at Cabinet or Council will be viewed as a strategic decision.

As this is an internal policy document, there is no direct impact on the communities or those identified in the assessment below.

If your decision does meet the definition, please consider the impact of your decision on the socio-economically disadvantaged groups, and areas of inequality that may arise from socio-economic disadvantage contained in the matrix below. The groups listed are not exhaustive and you should consider any additional groups relevant to your decision who may experience socio-economic disadvantage in the following ways:

- **Low Income/Income Poverty** – cannot afford to maintain regular payments such as bills, food, clothing, transport etc.
- **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
- **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.)
- **Area Deprivation** – where you live (rural areas), where you work (accessibility of public transport)
- **Socio-economic Background** – for example, parents' education, employment and income

Indicate a positive or negative impact, or both where they apply, and the severity of this impact by coding the sections of the grid based on the below. If there is no/neutral impact, please leave blank.

Negative Impact		Positive Impact	
N1	Negative impact – mild	P1	Positive impact – mild
N2	Negative impact – moderate	P2	Positive impact – moderate
N3	Negative impact – significant	P3	Positive impact – significant
N4	Potential for negative impact (but unsure)	P4	Potential for positive impact (but unsure)

## Areas of inequality that may arise from socio-economic disadvantage – definitions

**Education:** The capability to be knowledgeable, to understand and reason, and to have the skills and opportunity to participate in the labour market and in society.

**Work:** The capability to work in just and favourable conditions, to have the value of your work recognised, even if unpaid, to not be prevented from working and to be free from slavery, forced labour and other forms of exploitation.

**Living Standards:** The capability to enjoy a comfortable standard of living, in appropriate housing, with independence and security, and to be cared for and supported when necessary.

**Justice, Personal Security and Community Safety:** The capability to avoid premature mortality, live in security, and knowing you will be protected and treated fairly by the law.

**Health:** The capability to be healthy, physically and mentally, being free in matters of sexual relationships and reproduction, and having autonomy over care and treatment and being cared for in the final stages of your life.

**Participation:** The capability to participate in decision making and in communities, access services, know your privacy will be respected, and express yourself.

Groups	Living Standards	Work	Health	Education	Justice & community safety	Participation	Physical Environment
Children living in poverty	-	-	-	-	-	-	-
Low income households without dependent children	-	-	-	-	-	-	-
Unemployed young people	-	-	-	-	-	-	-
Long term unemployed	-	-	-	-	-	-	-
Homeless households	-	-	-	-	-	-	-
Refugees, migrants and asylum seekers	-	-	-	-	-	-	-
Deprived neighbourhoods - WIMD rank in 10% most deprived LSOA	-	-	-	-	-	-	-
People on Universal Credit / income related benefits	-	-	-	-	-	-	-
Adults with no qualifications or low qualifications	-	-	-	-	-	-	-
People living in low quality housing or in Houses of Multiple Occupation	-	-	-	-	-	-	-

**1. What evidence do you have about socioeconomic disadvantage and inequalities of outcome in relation to this decision?**

*Please expand on the information provided in the matrix, giving reasons for your assessment of both positive and negative impacts. You may like to consider your experience of current service delivery, recent engagement or consultation or any national/local research relevant to your policy decision.*

*For any positive impacts, please indicate the [Wellbeing Goal](#) and/or [Wellbeing Objective](#) that this contributes to as set out in the previous section.*

N/a

**2. Does this decision contribute to a cumulative impact?**

- A. Consider your decision in the wider context of your service area and the organisation. Is this part of, or does it contribute to, a series of decisions that have negative impacts for the same groups of people, or the same area of Newport (e.g. withdrawal of multiple services).*
- B. Consider whether your decision has a cumulative impact because of intersectionality – i.e. have you identified impacts on people that share Protected Characteristics who will be further disadvantaged by socio-economic impacts.*

N/a

## Part 4: Actions and Outcomes

Considering any negative impacts that you have identified, indicate below how you will reduce these, increase the potential for positive impacts, and how you will monitor those impacts. You must cover:

- Impacts on people who share protected characteristics
- Impact on Welsh Language
- Socio-economic impacts
- Sustainable Development Principle
- Armed Forces Community

Summary of impacts	Actions to reduce negative impact / opportunities to increase positive impacts	How these impacts will be monitored	Owners
N/a	N/a	N/a	N/a

Newport City Council requires all assessments to be published on our website. Please send a copy of this assessment to [nccequality@newport.gov.uk](mailto:nccequality@newport.gov.uk) for publication.