

Extract

Cabinet

17 September 2020

Report Title: Strategic Equality Plan 2020-2024

Integrated Impact Assessment

1. A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. The first stage impact assessment has indicated that a more in-depth assessment was required.

An overview of the Integrated Impact Assessment has been included below in summary form only and it is essential that Members read the Integrated Impact Assessment, which is attached to the report at Appendix 3, for the purposes of the meeting.

As a result of widespread changes in circumstances since March 2020 due to the global pandemic, the killing of George Floyd and the intensification of the Black Lives Matter movement it has been apparent that a refocus of our work was necessary. This being the case the equality objectives and actions were reviewed taking into account evidence of the impact the pandemic has had/continues to have on Black, Asian and minority ethnic communities and others who share protected characteristics. Although the equality objectives were deemed relevant the proposed actions did not adequately address the current situation.

Consequently the latter stages of the impact assessment has concentrated on the equality objectives including the subsequent conclusion.

The whole ethos of the Strategic Equality Plan and the equality objectives is to eliminate discrimination, harassment and victimisation as well to advance equality of opportunity between different groups. The equality objectives were developed with this in mind and as such will help address inequalities experienced by members of our various communities.

As a result of our continued work on improving the availability and quality of our services through Welsh there is potentially a positive impact in relation to opportunities to use the Welsh language.

There will be no adverse effect on biodiversity or Eco-system resilience

There will be a positive impact in relation to the Wellbeing of Future Generations as the equality objectives have been developed in line with the five ways of working.

Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
Version 1	Rhian Headon	Corporate Policy Office - Equality and Welsh Language	17.12.19
Version 2	Rhian Headon	Corporate Policy Office - Equality and Welsh Language	03.03.20
Version 3	Rhian Headon	Corporate Policy Office - Equality and Welsh Language	25.08.20

1. Details of the initiative

	Title of the Initiative: Strategic Equality Plan – Equality Objectives
1a	Service Area: Corporate Policy Unit
1b	Directorate: Chief Executive’s Office
1c	<p>Summary of the initiative:</p> <p>The Strategic Equality Plan contains the Council’s Equality Objectives along with information on how the Council will address equality issues, promote equality amongst staff and the public as well as meeting the legal requirements of the Equality Act 2010 and the Public Sector Duties 2011.</p> <p>The first stage in the production of the Strategic Equality Plan is the development of the objectives along with the identification of associated potential actions. With the implementation of the objectives our aim is to reduce and tackle the causes of inequality.</p>

1d	<p>Who will be directly affected by this initiative?</p> <p>Those who share protected characteristics of age, race, disability, sex, sexual orientation, gender reassignment and religion/belief.</p> <p>It is likely that carers and possibly women who are pregnant/on maternity may be affected indirectly.</p>
1e	<p>When and how were people consulted?</p> <p>Initial Development – an event was held with the Community of Practice for Engagement and Involvement to obtain an insight into what was important to the groups they regularly engage with. The feedback from this event, along with the themes from the ‘Is Wales Fairer?’ was to be considered by the various groups as part of a pilot with the Community of Practice, however no feedback was received.</p> <p>Based on both quantitative and qualitative evidence draft objectives were developed by the Equality and Community Cohesion Group.</p> <p>Public Consultation</p> <p>Public consultation on the Council’s draft equality objectives and potential actions was undertaken from 16 January to 20 February 2020.</p> <p>View could be submitted via a self-completion questionnaire published on the Council’s web site and via a consultation packs, including a hard copy of the questionnaire, in libraries and civic centres</p> <ul style="list-style-type: none"> • promotion via a press release • promotion via the Council’s corporate social media accounts messages • promotion and engagement via the Equality and Community Cohesion Group • promotion and engagement via Community of Practice on Innovation and Engagement
1f	<p>What were the outcomes of the consultation?</p> <p>Initial Development – the pilot engagement work with the Community of Practice unfortunately did not provide feedback to help shape the objectives. However, using evidence already available and pertinent to the local need, including data held but the Council, local and national initiatives, recent local research findings, national research as well as people’s lived experiences, it has been possible to draft equality objectives. However, these will be tested during the public consultation.</p> <p>Post Consultation</p>

A total of 46 responses were received all via the online survey, with:

- 44 in English and 2 in Welsh
- The majority of responses (where indicated) came from Port Talbot and the surrounding area.
- A high majority of respondents agreed/strongly agreed with each of the equality objectives.

Given the level of support for the equality objectives from respondents it was not considered necessary to make amendments.

Had circumstances remained unchanged some amendments to the proposed actions would have taken place. However, as circumstances have now overtaken the process the proposed actions are no longer considered relevant and will not be included in the Strategic Equality at this time.

25.08.20

In response to the disproportionate impact of the pandemic on Black, Asian and minority ethnic communities along with the stark realities of injustices brought to the world's attention over recent months a review of the equality objectives and proposed actions have been undertaken.

Taking into account evidence and reports widely reported as well as the views of the local BME Community Association it is considered that the equality objectives remain relevant but actions to meet them in the current circumstances required further development.

2. Evidence

What evidence was used in assessing the initiative?

Data available from the Census 2011 - attached

Various local regional and national research documents; for example Community Profile - NPT BME Community Association; Community Cohesion Survey; Smart and Connected - A Revised Digital Strategy; 'Making Money Work (people's lived experience in Neath Port Talbot)' – research undertaken by Toynbee Hall and Tai Tarian; 'Is Wales Fairer?' – Equality and Human Rights Commission.

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	✓			<p>It is anticipated that the impact will be positive on children and young adults, as well as older people.</p> <p>Children and Young People – working to improve educational attainment, non-attendance and exclusions as well as to address bullying in schools will ensure pupils will achieve their full potential. The challenges faced by many prior to school is a key factor to achievement. By working to meet the objectives we and, where appropriate, our partners will endeavour to reduce obstacles to learning as well as ensuring children and young people and their families are supported throughout their school life to have the best outcomes possible.</p> <p>Older people – our aging population is increasing and our work as an individual organisation and in partnership to support people remain independent for as long as possible is anticipated to have a positive impact. As a result of the implementation of actions under the various objectives positive impacts for older people are likely.</p> <p>Post consultation</p>

			<p>The positive impacts in relation to children and young people were echoed by respondents; predominantly in relation to education.</p> <p>The matter of age discrimination was identified and although not explained it is assumed this is in relation to employment (as it was linked to equal pay).</p> <p>The aim of the equality objectives is to improve children and young people's opportunities and outcomes. It is anticipated that the employment objective will address real and/or perceived discrimination through adherence to and development of relevant policies and practices.</p>
Disability	✓		<p>Working with partners to tackle hate incidents/crimes will help provide safer and more inclusive communities which will impact positively on those who have been subject to such victimisation due to their disability.</p> <p>By focusing on mental health within the workplace we will provide support for those who experience mental health and help remove the stigma associated with it.</p> <p>Access remains an issue for many but by working with groups to identify where improvements can be made, for example to our website and our committee rooms as well as in the digital arena we will be able to tackle and help reduce inaccessible services and communication.</p> <p>Post consultation</p> <p>Respondents highlighted positive impacts on their or their families' lives. The objectives would provide opportunities for many. Actions to meet the objectives will be key to ensure that positive impacts are realised.</p>
Gender reassignment	✓		<p>It is anticipated that the objectives will impact positively on the trans community – by helping dispel negative attitudes through awareness raising, opportunities for greater participation and community cohesion.</p> <p>Post consultation</p> <p>While some respondents identified there being positive impacts for this characteristic no details as to why were provided. The majority of respondents considered there would be no impact for them or their families.</p>
Marriage & civil partnership		✓	<p>Impacts on this group is unknown at this time but will be tested during consultation.</p> <p>Post consultation</p>

			<p>While some respondents identified there being positive impacts for this characteristic no details as to why were provided. The majority of respondents considered there would be no impact for them or their families.</p>
Pregnancy and maternity		✓	<p>Impact on this group is unknown at this time it but will be tested during consultation. However, it is possible that there will be positive indirect impacts as a result of our work to promote wellbeing and good mental health, to ensure our employment policies are fair and equitable and to reduce poverty.</p> <p>Post consultation</p> <p>While some respondents identified there being positive impacts for this characteristic no details as to why were provided. The majority of respondents considered there would be no impact for them or their families.</p>
Race	✓		<p>It has been apparent from the various pieces of national and local research that members of the BME Community have encountered negative experiences from being victims of hate crime/incidents, to language barriers when accessing services. By addressing the personal safety and living standards objectives it is likely that the community will be impacted positively.</p> <p>In addition it is likely that the education and health and wellbeing objectives will have positive impacts for children and young people and their families while the employment objective will ensure we have policies and practices in place to encourage a workforce that better reflects our communities.</p> <p>Post consultation</p> <p>Respondents highlighted positive impacts on their or their families' lives. While objectives would provide opportunities for many actions to meet the objectives will be key to ensure that positive impacts are realised.</p> <p>However, one respondent commented that 'As a non-Welsh person living and working in Wales, I already feel discriminated against by Welsh Government policy and practice'. It will be incumbent on the Strategic Equality Plan and the equality objectives to address such feelings to ensure opportunities are afforded to all regardless of their race or other characteristics and to ensure communities do not become divisive.</p>

Religion or belief	✓		<p>Working more closely with our faith communities we will be in a position to better understand issues faced as a result of their faith which will improve the support, advice and service we are able to provide.</p> <p>Post consultation</p> <p>While some respondents identified there being positive impacts for this characteristic no details as to why were provided. The majority of respondents considered there would be no impact for them or their families</p>
Sex	✓		<p>The objectives aim to address the inequality experienced by many due to their sex. Our work in relation to gender pay will help alleviate and in time eradicate the imbalance between the genders as well as providing a foundation for future work in relation to unequal pay gaps.</p> <p>Although it is predominantly women who experience domestic abuse in NPT the number of male victims is increasing and it is recognised that there is limited support and advice available to them. This has been identified in the Healthy Relationships for Safer Communities Strategy that is currently being revised.</p> <p>The gap in educational attainment between boys and girls, at its most basic level, is continuing. By working with schools we aim to put in place support and practices to address as well as ensuring families are also supported.</p> <p>Post consultation</p> <p>Respondents highlighted positive impacts on their or their families' lives; gender pay equality was cited by respondents (where identified) as the reason.</p> <p>While objectives would provide opportunities for many, actions to meet the objectives will be key to ensure that positive impacts are realised.</p> <p>However, the majority of respondents considered there would be no impact for them or their families.</p>
Sexual orientation	✓		<p>Our evidence indicates that the number of reports of hate crime/incidents for this particular group remains high, which appears to be supported by the responses received in the Community Cohesion Survey. It is anticipated that the implementation of the objectives will have a positive impact in helping reduce the numbers of instances.</p> <p>Post consultation</p>

				While some respondents identified there being positive impacts for this characteristic no details as to why were provided. The majority of respondents considered there would be no impact for them or their families.
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What action will be taken to improve positive or mitigate negative impacts?

Consultation is required to identify actual impact, particularly in relation to the protected characteristics of Marriage & Civil Partnership and Pregnancy and Maternity, and to explore potential mitigating actions for consideration

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	✓			The whole ethos of the Strategic Equality Plan is to eliminate discrimination, harassment and victimisation as well to advance equality of opportunity between different groups the implementation of the Plan will certainly progress this. Our commitment to engagement with different groups and communities in the development of the objectives has allowed greater understanding between groups, a shared sense of purpose, and a sense of increasing confidence to reduce inequality and tackle its causes.
To advance equality of opportunity between different groups	✓			
To foster good relations between different groups	✓			

What action will be taken to improve positive or mitigate negative impacts?

Consultation is required to identify any actual impact and to explore potential mitigating actions for consideration

4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	✓			Working with our various communities we will help provide support and assistance to those who experience isolation and exclusion due to language barriers, encourage community activities and events and help people participate via appropriate forms of engagement to ensure their voices are heard in the development of policies.
Social Exclusion	✓			It would appear from available research, that the many facets of social exclusion are either a direct or indirect consequence of a small number of circumstances, for example access to public transport and digital services etc., low income or debt, isolation or limited opportunities. The various actions to meet the objectives go some way to help resolve these issues and provide opportunities for members of the various communities in Neath Port Talbot to take an active role (as far they may wish to) for their own benefit as well as for the community in which they live/associate with.
Poverty	✓			Addressing the causes and consequences of poverty will be a key feature of our work over the next few years especially based on the feedback from the Poverty Symposium and the various research projects undertaken locally and nationally. Over recent years we have become increasingly aware of the various aspects of poverty within our area and have identified work streams to address some of these; our work to address adverse childhood experiences is one such work stream.

				<p>The development of an Anti-Poverty Strategy will provide a structured approach for our work and identify areas where greatest impacts can be made for those most in need.</p> <p>The soon to be introduced socio economic duty will provide further impetus for this work and we will ensure we are able to meet its requirements.</p>
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What action will be taken to improve positive or mitigate negative impacts?

Consultation is required to identify any actual impact and to explore potential mitigating actions for consideration

5. Welsh

	+	-	+/-	Why will it have this effect?
<p>What effect does the initiative have on:</p> <ul style="list-style-type: none"> – people’s opportunities to use the Welsh language 			✓	<p>Opportunities to use Welsh will continue for all ages and linguistic abilities. We will continue to raise awareness of the language along with cultural and historic awareness as an employer as well as to support other organisations/third sector groups to also do so.</p> <p>As a service provider we will continue to and work on improving the availability and quality of our services through Welsh.</p> <p>Opportunities for staff will continue to be promoted so that the Welsh language is treated no less favourably than the English Language.</p>
<ul style="list-style-type: none"> – treating the Welsh and English languages equally 			✓	<p>We will continue to treat Welsh no less favourably than English as required by the Welsh language standards.</p>

What action will be taken to improve positive or mitigate negative impacts?

Consultation is required to identify any actual impact and to explore potential mitigating actions for consideration

6. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			✓	It is likely there will be no change as a result of this proposal
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			✓	It is likely there will be no change as a result of this proposal

What action will be taken to improve positive or mitigate negative impacts?

Consultation is required to identify any actual impact and to explore potential mitigating actions for consideration

7. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	<p>Initial Development - Although the timescales for the Equality Objectives are relatively short, 4 years, they have been developed in line with the following long-term Wellbeing Gola goals:</p> <ul style="list-style-type: none"> • A more equal Wales • A Wales of cohesive communities • A Wales of vibrant culture and thriving Welsh language.
ii. Prevention – preventing problems occurring or getting worse	<p>Initial Development - It is anticipated that by working towards these objectives we will reduce and tackle the causes of inequality. The various plans and strategies linked to the objectives will further enhance this work</p>
iii. Collaboration – working with other services internal or external	<p>Initial Development - The Equality and Community Cohesion Group, with a membership of council officers and representatives from a range of local equality groups has overseen and been actively involved in the development of the objectives. Various plans and strategies that are being/have been developed to meet both the Council’s individual responsibilities as well as those in partnership with others bodies informed their development.</p>
iv. Involvement – involving people, ensuring they reflect the diversity of the population	<p>Initial Development - A range of varied sources have been used to inform the development of the objectives including life experiences of specific communities, the Equality and Community Cohesion Group, with a membership of council officers and representatives from a range of local equality groups. While greater involvement of people who share protected characteristics was planned these opportunities were not taken up in the initial stages. However, involvement/engagement will continue and any feedback will be taken into account prior to the objectives being finalised.</p>
v. Integration – making connections to maximise contribution to:	<p>Initial Development - The equality objectives as developed will help meet the Council’s Wellbeing objectives and complement the priorities in the Council’s Corporate Plan</p>
Council’s well-being objectives	<p>Initial Development Well-being Objective 1 - To improve the well-being of children and young people Well-being Objective 2 - To improve the well-being of all adults who live in the county borough</p>

	Well-being Objective 3 - To develop the local economy and environment so that the well-being of people can be improved
Other public bodies objectives	<p>Initial Development</p> <p>Objective 1: Support children in their early years, especially children at risk of adverse childhood experiences</p> <p>Objective 2: Create safe, confident and resilient communities, focusing on vulnerable people</p> <p>Objective 3: Put more life into our later years - Ageing Well</p> <p>Objective 4: Promote well-being through work and in the workplace</p> <p>Objective 6: Tackle digital exclusion</p>

8. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

25.08.20

The corporate Equality and Community Cohesion Group will be responsible for keeping the equality objectives under review as well as monitoring progress.

In light of changes in circumstances actions and measure will be developed and kept under review to ensure that they are fit for purpose.

As required by legislation progress on the equality objectives will be reported in an annual report.

9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	There is a positive impact with the equality objectives contributing to our work to address inequality and tackle the causes of inequality experienced by particular groups within our society. Engagement with different groups and communities in the development of the objectives has allowed greater understanding between groups and fostered a shared sense of purpose.
Community Cohesion/ Social Exclusion/Poverty	The equality objectives will have a positive effect on the many facets that contribute to people's experiences of poverty and social exclusion and will potentially result in stronger communities, greater community involvement and participation thereby ensuring their voices are heard.
Welsh	As a result of our continued work on improving the availability and quality of our services through Welsh there is potentially a positive impact in relation to opportunities to use the Welsh language.
Biodiversity	There will be no adverse effect on biodiversity or Eco-system resilience
Well-being of Future Generations	There will be a positive impact as the equality objectives have been developed in line with the five ways of working

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

As a result of widespread changes in circumstances since March 2020 due to the global pandemic, the killing of George Floyd and the intensification of the Black Lives Matter movement it has been apparent that a refocus of our work was necessary. This being the case the equality objectives and actions were reviewed taking into account new evidence of the impact the pandemic has had/continues to have on Black, Asian and minority ethnic communities and others who share protected characteristics. Although the equality objectives were deemed relevant the proposed actions did not adequately address the current situation.

Consequently the latter stages of the impact assessment has concentrated on the equality objectives including the subsequent conclusion.

The whole ethos of the Strategic Equality Plan and the equality objectives is to eliminate discrimination, harassment and victimisation as well to advance equality of opportunity between different groups. The equality objectives were developed with this in mind and as such will help address inequalities experienced by members of our various communities.

As a result of our continued work on improving the availability and quality of our services through Welsh there is potentially a positive impact in relation to opportunities to use the Welsh language.

There will be no adverse effect on biodiversity or Eco-system resilience

There will be a positive impact in relation to the Wellbeing of Future Generations as the equality objectives have been developed in line with the five ways of working.

10. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Undertaken a public Consultation exercise to test the impact of the objectives on those who share protected characteristics.	Rhian Headon	February 2020	Feedback received
Consider responses and amend objectives where appropriate	Rhian Headon/Equality and Community Cohesion Group	March 2020	Consultation Report and any proposed amendments reported to and agreed for presenting to Cabinet Scrutiny /Cabinet by the Equality and Community Cohesion Group
Draft Strategic Equality Plan	Rhian Headon	February/March/ April 2020	Draft Plan including any revisions agreed for presenting to Cabinet Scrutiny /Cabinet by the Equality and Community Cohesion Group
Revision of equality objectives and actions in light of the impact of the global pandemic and Black Lives Matter movement	Rhian Headon/Equality and Community Cohesion Group	August 2020	Further revised equality objectives /actions included in the Strategic Equality Plan for presenting to Cabinet Scrutiny /Cabinet by the Equality and Community Cohesion Group.

11. Sign off

	Name	Position	Date
Completed by	Rhian Headon	Corporate Policy Office - Equality and Welsh Language	25.08.20
Signed off by	Karen Jones	Head of Service/Director	25.8.20