

EAS - Integrated Impact Assessment

This Fairness and Equality Impact Assessment (FEIA) has been designed to assist to help support the EAS in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Welsh Language Standards (Wales) 2015
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015

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.

1. Proposal Details			
Lead Officer	SMT Approval	Service Area & Department	Date
Edward Pryce	Geraint Willington	EAS Wide	13/1/2022

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

What is the proposal to be assessed? <i>Provide brief details of the proposal and provide a link to any relevant report or documents.</i>
<p>The EAS is required by Welsh Government to submit an annual overarching regional Business Plan on an annual basis. The EAS then delivers, through this plan, a wide range of school improvement services to all schools (all key stages, including all through schools and special schools), pupil referral units and funded non-maintained nursery settings on behalf of each LA. This plan supports the role LAs have in delivering their statutory function, addressing their individual improvement priorities and promoting improved pupil outcomes.</p> <p>As an organisation we have reviewed how we have written the Business Plan and communicated this to our partners. We have used the 'Theory of Change' approach to help us articulate the changes and impact we want to make as the regional school improvement service for South-East Wales and the connections and actions needed that will allow that change and impact to be successfully achieved. This Business Plan spans a three-year period and will receive annual reviews each year.</p> <p>The proposal is for each Local Authority cabinet to approve the business plan (which commences 1 April 2022, following consultation from January to early March) prior to submission to Welsh Government.</p>

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.

Protected Characteristics	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?
Age <i>(people of all ages)</i>	Positive		The EAS Business Plan delivers school improvement services to all schools and settings. There is no direct work with the public and no direct support for learners with Additional Learning Needs (ALN), as this remains within the remit of the Local Authority. Descriptions of the range of support and professional learning programmes, including elements on wellbeing and support for schools in developing and inclusive curriculum for all are included.
Disability <i>(people with disabilities/ long term conditions)</i>	Positive		The EAS Business Plan delivers school improvement services to all schools and settings. There is no direct work with the public and no direct support for learners with Additional Learning Needs (ALN), as this remains within the remit of the Local Authority. Descriptions of the range of support and professional learning programmes, including elements on wellbeing and support for schools in developing and inclusive curriculum for all are included.

<p>Gender Reassignment <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth)</i></p>	<p>Neutral</p>		<p>The business plan would have no tangible direct impact on these groups. If there was any impact it would be positive in terms of support for schools in terms of developing an inclusive approach through our professional learning.</p>
<p>Marriage or Civil Partnership <i>(people who are married or in a civil partnership)</i></p>	<p>Neutral</p>		<p>The business plan would have no tangible direct impact on these groups. If there was any impact it would be positive in terms of support for schools in terms of developing an inclusive approach through our professional learning.</p>
<p>Pregnancy and Maternity <i>(women who are pregnant and/or on maternity leave)</i></p>	<p>Neutral</p>		<p>The business plan would have no tangible direct impact on these groups. If there was any impact it would be positive in terms of support for schools in terms of developing an inclusive approach through our professional learning.</p>
<p>Race <i>(people from black, Asian and minority ethnic communities and different racial backgrounds)</i></p>	<p>Positive</p>		<p>The EAS Business Plan delivers school improvement services to all schools and settings. There is no direct work with the public and no direct support for learners with Additional Learning Needs (ALN), as this remains within the remit of the Local Authority. Descriptions of the range of support and professional learning programmes, including elements on wellbeing and support for schools in developing and inclusive curriculum for all are included.</p>

Religion or Belief <i>(people with different religions and beliefs including people with no beliefs)</i>	Neutral		The business plan would have no tangible direct impact on these groups. If there was any impact it would be positive in terms of support for schools in terms of developing an inclusive approach through our professional learning.
Sex <i>(women and men, girls and boys and those who self-identify their gender)</i>	Neutral		The business plan would have no tangible direct impact on these groups. If there was any impact it would be positive in terms of support for schools in terms of developing an inclusive approach through our professional learning.
Sexual Orientation <i>(lesbian, gay, bisexual, heterosexual)</i>	Neutral		The business plan would have no tangible direct impact on these groups. If there was any impact it would be positive in terms of support for schools in terms of developing an inclusive approach through our professional learning.

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 (LAC / CLA)
- 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

Socio-economic Disadvantage	Does the proposal have any positive, negative or neutral	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
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	impacts on the following and how?		
Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	Section not applicable, as this Business Plan is not a strategic decision. However the plan describes a range of support for schools related to reducing socio-economic impact, particularly for learners who are eligible for Free School Meals (FSM) or those who are looked after (LAC/CLA)		
Low and/or No Wealth <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>			
Material Deprivation <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>			
Area Deprivation <i>(where you live (rural areas), where you work (accessibility of public transport)</i>			
Socio-economic Background <i>(social class i.e. parents education, employment and income)</i>			
Socio-economic Disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or</i>			

vulnerability or because they are already disadvantaged)			
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4. Well-being Objectives

(How does your proposal deliver against regional Councils' 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?)

Improving education opportunities for all	<p>The EAS delivers, through an agreed Business Plan, a wide range of school improvement services to all schools (all key stages, including all through schools and special schools), pupil referral units and funded non-maintained nursery settings on behalf of each LA. This plan supports the role LAs have in delivering their statutory function, addressing their individual improvement priorities and promoting improved pupil outcomes. Plan priorities include:</p> <p>Ensuring that the wellbeing of practitioners and learners in schools and settings remains paramount. Regional professional learning will be provided to support the social and emotional needs of the workforce and learners.</p> <p>Continuing to provide support to school leaders on the identification and support for specific groups of disadvantaged and vulnerable learners including those who have been disproportionality affected by school closures.</p>
Enabling employment	Improved educational outcomes are linked to improved employment prospects.
Housing objectives	n/a
Transport / environment impact	n/a
Healthy lifestyle / sustainable development principle within the Well-being of Future Generations (Wales) Act 2015	n/a
Wellbeing objectives	n/a

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)

Ways of Working	How have you used the Sustainable Development Principles in forming the proposal?
Long Term	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p>This is a three-year business plan with one-year updates as stipulated by Welsh Government. The plan however supports the development of a self-improving school system and all Welsh Government long term strategic objectives in relation to school improvement. Longer term projections are not possible due to significant proportions of EAS work being funded by Welsh Government Regional grants for schools which are only known on a one year basis.</p>
Prevention	<p>Consider how the proposal is preventing problems from occurring or getting worse</p> <p>The plan is designed to support the development and growth of schools, as part of a self improving system.</p>
Integration	<p>Consider how your proposal will impact on other services provided in our communities (these might be Council services or services delivered by other organisations or groups)</p> <p>This Business Plan has been completed in consultation and collaboration with all five Local Authorities, and been informed by a broad ranging consultation exercise. Individual councils will need to consider how the business plan links to other council services</p>
Collaboration	<p>Consider how you are working with Council services or services delivered by other organisations or groups in our communities.</p> <p>This Business Plan has been completed in consultation and collaboration with all five Local Authorities, and been informed by a broad ranging consultation exercise. Individual councils will need to consider how the business plan links to other council services.</p>
Involvement	<p>Consider how you involve people who have an interest in this proposal and ensure that they represent the diversity of our communities.</p> <p>This Business Plan has been completed in consultation and collaboration with all five Local Authorities, and been informed by a broad ranging consultation exercise across all stakeholder groups.</p>

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

Wellbeing Goals	Does the proposal maximise council's contribution to the Well-being Goals and how?
<p>A Prosperous Wales <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>Efficient use of resources, skilled, educated people generates wealth and provides jobs The plan will deliver a wide range of school improvement services to all schools (all key stages, including all through schools and special schools), pupil referral units and funded non-maintained nursery settings on behalf of each LA. This will contribute, through schools and partners in the Local Authority to a skilled and well-educated population.</p> <p>High quality education is a fundamental of ensuring future local and national prosperity through the provision of an informed and well-educated workforce and society. The Local Authority's statutory role to support, monitor and evaluate school performance and the quality of provision is essential.</p>
<p>A Resilient Wales <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change) n/a</p>
<p>A Healthier Wales <i>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>People's physical and mental well-being is maximised and health impacts are understood The EAS has placed wellbeing at the forefront of its work and will continue to provide a range of professional learning to schools and settings that has provided support to the social and emotional needs of the workforce and learners.</p>
<p>A More Equal Wales <i>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)</i></p>	<p>People can fulfil their potential no matter what their background or circumstances. This includes the protected characteristics listed in Q2 above. Also consider the cumulative impacts. The plan supports the development of strategies in schools that support equity and equality, including continuing to provide support to school leaders on the identification and support for specific groups of disadvantaged and vulnerable learners including those who have been disproportionality affected by school closures.</p>

Well-being Goals	Does the proposal maximise our contribution to the Well-being Goal and how?
A Wales of Cohesive Communities <i>Attractive, viable, safe and well-connected communities</i>	Communities are attractive, viable, safe and well connected. n/a
A Wales of Vibrant Culture and Thriving Welsh Language <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>	Culture, heritage and the Welsh language are promoted and protected. People are encouraged to participate in sport, art and recreation. All schools are required to promote Welsh culture and heritage through the Cwricwlwm Cymreig and to ensure that pupils are able to learn and practice the Welsh Language. Support for both is a key strand of the business plan.
A Globally Responsible Wales <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>	Taking account of impact on global well-being when considering local social, economic and environmental well-being. Ensuring high quality education is fundamental to securing the economic, social and cultural wellbeing of future generations. The Business Plan focuses support for all schools appropriately schools. The school curriculum includes focus on social, environmental and cultural well-being, and these aspects are support as part of the plan.

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

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Councils 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). Whilst not bound by this standard the EAS Welsh Language Policy explains how this duty is complied with to the same level.

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?
Links with Welsh Government's Cymraeg 2050 Strategy and Local Authority's Welsh Language Strategies	The EAS has an updated (September 2021) Welsh Language Policy in place and Welsh language support for schools development of the language is included in the plan.	Positive	EAS Welsh Language Policy (Sept 2021) EAS Welsh Language Strategy included within the Business Plan (2022-2025)
Compliance with the Welsh Language Standards	Promoted through the EAS Welsh Language Policy	Positive	Compliance with the policy Section within the EAS Annual Headteacher / other staff stakeholder survey
Opportunities to promote the Welsh language e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community	Promoted through the EAS Welsh Language Policy. All materials for schools are bilingual.	Positive	Compliance with the policy Section within the EAS Annual Headteacher / other staff stakeholder survey
Opportunities for persons to use the Welsh language e.g. staff, residents and visitors	Promoted through the EAS Welsh Language Policy. All materials for schools are bilingual, and all schools / governors have opportunity for a response by a Welsh speaking member of staff where requested.	Positive	Compliance with the policy Section within the EAS Annual Headteacher / other staff stakeholder survey

<p>Treating the Welsh language no less favourably than the English language</p>	<p>Promoted through the EAS Welsh Language Policy. All materials for schools are bilingual, and all schools / governors have opportunity for a response by a Welsh speaking member of staff where requested.</p>	<p>Positive</p>	<p>Compliance with the policy Section within the EAS Annual Headteacher / other staff stakeholder survey</p>
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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.

The EAS Welsh Language Policy (Updated September 2021) describes in full the ways in which the EAS complies with the Welsh Language Measure (2015), including accesses to all materials bilingually, actively promotes the use of the language and offers an ever a range of services and support through the medium of Welsh for those who require them.

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.)

<p>Data/evidence <i>(Please provide link to report if appropriate)</i></p>	<p>Key relevant findings</p>	<p>How has the data/evidence informed this proposal?</p>
<p>What data / evidence was used? Provide links to any reports if appropriate e.g. Household Survey 2017</p> <p>Please note that a mid-year evaluation of the current revised Covid Business Plan (2020/21) has been submitted to each of the EAS governance groups and has been available for local authorities to share as appropriate within their own democratic processes.</p>	<p>What were the key findings? What did the data / evidence used tell you?</p> <p>A full analysis of feedback from consultations will be incorporated into the final plan.</p>	<p>How has the data / evidence available helped inform the proposal? Did it support the proposal and how? If the data / evidence didn't support the proposal why was this?</p> <p>The plan has also been informed by a broad range of visioning sessions available for all stakeholders and is informed by a range of stakeholder surveys whose outcomes have been analysed across 2021-2022.</p>

Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?
Details of further consultation can be included in Section 9.

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

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.)

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

The Business Plan has been through a consultation process. The Consultees are noted below:

- EAS staff
- Directors of Education (within South East Wales) and Diocesan Directors
- Regional Joint Executive Group
- EAS Company Board
- EAS Audit and Risk Assurance Committee
- Individual local authority education scrutiny committees
- All Headteachers from within the region
- All Chairs of Governors from within the region
- School Councils from within the region
- All school based Professional Learning Leads
- EAS Supporting School Trade Union Group (SSTU Group)

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

From October – December 2021

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

The full draft Business Plan was shared with all consultees.

What were the key findings?

All feedback has been considered and where appropriate incorporated into the final Business Plan.

How have the consultation findings been taken into account?

All feedback has been considered and where appropriate incorporated into the final Business Plan.

10. Monitoring and Review

<p>How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?</p>	<p>For example, what monitoring will be used? How frequent? There are many ways of capturing and sharing what the EAS does which are exemplified in this model as outputs. The progress on the implementation and impact of the Business Plan will be reported to the Joint Executive Group and Company Board. These reports, as in previous years, will be suitable for scrutiny activity at local authority and national level. In addition, the progress made towards the implementation of key actions will be reported at each meeting of the Joint Executive Group and Company Board. This approach will be aligned to the national changes in the accountability system.</p>
<p>What are the practical arrangements for monitoring?</p>	<p>Bi-monthly meetings of EAS Joint Executive Group, Company Board and the Audit and Risk Assurance Committee, all of whom have council representatives. All groups are chaired by an elected member.</p>
<p>How will the results of the monitoring be used to develop future proposals?</p>	<p>In the same way that this business plan has been informed by previous business plans. Through a comprehensive evaluation and subsequent consultation process.</p>
<p>When is the proposal due to be reviewed?</p>	<p>Bi-monthly internally to governance groups.</p>
<p>Who is responsible for ensuring this happens?</p>	<p>Overall EAS Managing Director supported by broader Senior Leadership Team</p>

11. Recommendation and Reasoning

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

12. Reason(s) for Recommendation

(Provide below a summary of the Fairness and Equalities Impact Assessment.)

The EAS is required to submit an annual overarching regional Business Plan on an annual basis. The proposal is for cabinet to approve the business plan (which commenced on 1 April 2022, following consultation from January to early March) prior to submission to Welsh Government.

The plan provides support for school improvement services directly to schools across the region. The plan does not include changes to the services, or delivery methods for any particular group or groups. It is therefore at least neutral in its impact with many positive benefits, particularly in relation to wellbeing goals and support for disadvantaged learners.

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	Edward Pryce		13/1/2022

Integrated Impact Assessment Author

Name:	Edward Pryce
Job Title:	Assistant Director – Policy and Strategy
Date:	13/1/2022

EAS SMT Approval

Name:	Geraint Willington		
Job Title:	Director		
Signature:		Date:	13/1/2022