

## **Blaenau Gwent 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 to promote equality and improve outcomes for groups with protected characteristics. PLEASE NOTE: that you no longer need to complete a screening template. All decisions, policy reviews or policy implementation will now require a completed Integrated Impact Assessment.**

- Section 1-Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Section 2-Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Section 3-Corporate Plan
- Section 4-Wellbeing of Future Generations (Wales) Act 2015
- Section 5-Welsh Language (Wales) Measure 2011
- Section 6-Children’s Right “The Right Way”
- Section 7-Community Safety
- Section 8 Armed Forces
- Section 9-Data
- Section 10-Consultations Statutory Consultation Doctrine of Legitimate Expectation and Gunning Principles
- Section 11-Monitoring
- Section 12-Decision of proposal

Lead Officer	Head of Service	Service Area & Department	Date
Joanne Watts	Lynn Phillips	Education, Education Transformation and Business Change	18.4.23

Briefly outline the proposal indicating what change or decision is to be made, also provide any documentation that may be used to support this.  
**What is the proposal that needs to be assessed?**

**There are no associated policy developments and proposal, however, the Council is consulting upon a proposal to increase Capacity of ALN provision in the County Borough for Autistic Spectrum Disorder ASD and ALN Resource Bases across the County Borough**

**Section 1**

Outline how the proposal will impact on any people or groups of people with protected characteristics, please refer to the Equalities Act 2010 (Wales) for further information [Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and the EHRC guidance [The Essential Guide to the Public Sector Equality Duty: EHRC](#)

Briefly outline below if there will be any positive or negative impacts as a result of the proposal being considered.

Protected characteristics	Will the proposal have any positive impacts on those with a protected characteristics?	Will the proposal have any negative impacts on those with a protected characteristics?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<b>Age</b> ( <i>people of all ages</i> )	Yes	No	Any pupil from age 3 – 16 will have access to additional spaces in a Autism Spetrum Disorder (ASD)/ Additional Learning Needs (ALN) Resource Base in mainstream education
<b>Disability</b> ( <i>people with disabilities/ long term conditions</i> )	Yes	No	The implementation of additional resource bases will ensure improved access to a high-quality, fully accessible teaching and learning environment, in line with 21st Century School standards, whilst also being DDA compliant. The additional facilities will ensure the health and safety of, along with improved wellbeing for a greater number of pupils in need of specialist provision.
<b>Gender Reassignment</b> ( <i>anybody who's gender identity or gender expression is different to the sex they were assigned at birth</i> )	No	No	

<b>Marriage or Civil Partnership</b> ( <i>people who are married or in a civil partnership</i> )	No	No	
<b>Pregnancy and Maternity</b> ( <i>women who are pregnant and/or on maternity leave</i> )	No	No	
<b>Race</b> ( <i>people from black, Asian and minority ethnic communities and different racial backgrounds</i> )	No	No	
<b>Religion or Belief</b> ( <i>people with different religions and beliefs including people with no beliefs</i> )	Yes	No	This proposal is considering a ALN/ASD RB in a Faith Based School as part of Phase 2
<b>Sex</b> ( <i>women and men, girls and boys and those who self-identify their gender</i> )	No	No	
<b>Sexual Orientation</b> ( <i>lesbian, gay, bisexual, heterosexual, other</i> )	No	No	

**NOTE: Section 2 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.**

<b>Section 2</b> <b>Socio-economic Duty (Strategic Decisions Only)</b> <i>The Welsh Governments <a href="#">Socio-economic Duty</a> provides a framework in order to ensure tackling inequality is at the forefront of decision making.</i>			
<b>.Please consider the below vulnerable groups and consider how the proposal could affect them:</b>			
<ul style="list-style-type: none"> <li>➢ Single parents and vulnerable families</li> <li>➢ People with low literacy/numeracy</li> <li>➢ Pensioners</li> <li>➢ Looked after children</li> <li>➢ Homeless people</li> <li>➢ Carers</li> <li>➢ Armed Forces Community</li> <li>➢ Students</li> <li>➢ Single adult households</li> <li>➢ People misusing substances</li> <li>➢ People who have experienced the asylum system</li> <li>➢ People of all ages leaving a care setting</li> <li>➢ People living in the most deprived areas in Wales (WIMD)</li> <li>➢ People involved in the criminal justice system</li> </ul>			
Socio Economic disadvantage definitions.	Will the proposal have a positive, negative or neutral impacts on the below?	How could you mitigate the negative impacts outlined?	Please highlight any evidence that has been considered.
<b>Low Income / Income Poverty</b> <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	Neutral		
<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>	Neutral		




<p><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>)</p>	<p>Neutral</p>		
<p><b>Area Deprivation</b> (<i>where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?</i>)</p>	<p>Neutral</p>		
<p><b>Socio-economic Background</b> (<i>social class i.e. parents education, employment and income</i>)</p>	<p>Neutral</p>		
<p><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>)</p>	<p>Neutral</p>		

**Section 3-Corporate Plan**



*Please outline any Corporate Plan linkages of the proposal -[BG Corporate Plan 22-27](#)*

<p><b>Priority 1</b> - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent</p>	<p>The Education Directorate is committed to providing high quality services to its citizens and uses various engagement methodologies in order to understand if the service is making the intended outcomes or if amendments to service delivery need to be considered</p>
<p><b>Priority 2</b> - Respond to the nature and climate crisis and enable connected communities</p>	<p>By placing provisions in much needed areas, it is recognised that it can support and connect communities in school for ALN pupils i.e. much needed revolving door and pupils being part of their school community.</p>
<p><b>Priority 3</b> - An ambitious and innovative council delivering quality services at the right time and in the right place</p>	<p>Effective engagement is crucial to ensure the Council runs effectively, the services delivered are appropriate and meet the needs of those that use them</p>
<p><b>Priority 4</b> - Empowering and supporting communities to be safe, independent and resilient</p>	<p>Blaenau Gwent Council, together with its fellow local authorities across Gwent, have worked with schools, not only to challenge racism and hate crime, but to also promote inclusion and celebrate the region's diversity</p>

**Section 4-Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)**  
*Sustainable development principles. The WCFG 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)*

<b>Five Ways of Working</b>	<b>How have you used the Sustainable Development Principles in forming the proposal?</b>
<p><b>Long Tern</b></p> 	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p><b>The proposal is aimed at creating a long term local solution for Pupils with ALN within the County Borough,</b></p>
<p><b>Prevention</b></p> 	<p>Consider how the proposal is preventing problems from occurring or getting worse</p> <p><b>The proposal is aimed at providing the right services for the right pupils in the right location preventing escalation of special school placements and keeping pupils in mainstream settings with the support they need.</b></p>
<p><b>Integration</b></p> 	<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><b>It is important for pupils who present with ALN needs are integrated into mainstream setting enabling them to thrive along with the peers.</b></p>



<p><b>Collaboration</b></p> 	<p>Consider how you are working with Council services or services delivered by other organisations or groups in our communities.</p> <p><b>Education Transformation team and Inclusion Service have worked collaboratively to ensure pupils have the provision they need to thrive.</b></p>
<p><b>Involvement</b></p> 	<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><b>All interested parties will be consultees in this process if approved.</b></p>

<p><b>How does your proposal link to the Welsh Governments Priorities for Wales? Please indicate below.</b></p>	
<p>1. <b>A PROSPEROUS WALES</b> ... 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.</p>	<p>Having localised resource bases for pupils who need this intervention will reduce travel and transport costs and contribute to a low carbon society.</p>
<p>2. <b>A RESILIENT WALES</b> ... a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change). Think about how your activity will have regard to protecting and enhancing biodiversity.</p>	

See above
<p>3. <b>A HEALTHIER WALES ...</b> 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.</p>
<p>This supports pupils mental well-being by not having to travel potentially out side of the County Borough for their Education.</p>
<p>4. <b>A MORE EQUAL WALES ...</b> A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>
<p>There will be more options for parents to consider based on their child’s schooling. English medium, Faith Based and Welsh-medium.</p>
<p>5. <b>A WALES OF COHESIVE COMMUNITIES ...</b> attractive, viable, safe and well-connected communities.</p>
<p>Enables pupils to feel connected to their communities weather this is mainstream school or local area rather than being education out of county.</p>
<p>6. <b>A WALES OF VIBRANT CULTURE AND THRIVING ...</b> 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.</p>
<p>This proposal will enable Welsh-medium pupils to access ALN provision via the medium of Welsh in a Welsh-medium school and continue to be involved in the mainstream activities such as the Urdd and sports via the medium of Welsh.</p>
<p>7. <b>A GLOBALLY RESPONSIBLE WALES ...</b> 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.</p>
<p>Promoting the opportunities for 1m speakers by 2050.</p>

**Section 5-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 that any proposal may have on opportunities to use the Welsh language. [Welsh Language Standards](#))*

Requirement	Does the proposal have any positive, negative or neutral impacts in regards to the below?	What can be done to mitigate any negative impacts?	Please demonstrate any evidence used to form this opinion.
<p><b>Compliance with the Welsh Language Standards.</b> <i>Specifically Standards 88 - 93</i></p>	Yes	No	Under Blaenau Gwent's Welsh in Education Strategic 10-Year Plan Outcome 6 Additional Learning Needs within the first 5 years of the plan.
<p><b>What opportunities are there to promote the Welsh Language?</b> <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	Yes	No	Parents will have the opportunity to keep their child who would need ALN provision in Welsh medium education if the proposal proceeds
<p><b>What opportunities are there for a person or person to use the Welsh Language?</b> <i>e.g. staff, residents and visitors</i></p>	Yes		One of the proposed bases will be located in Ysgol Gymraeg Bro Helyg.
<p><b>Has the Welsh Language been considered in order to treat the Welsh language no less favourably than the English language?</b></p>	No	No	Should the Proposal be approved provision will be implemented in both English/Welsh Primary and Secondary locations.

**Section 6 – Children’s Rights Approach - [The Right Way](#)**

The Children’s Rights Approach – The Right Way is a framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). It places the UNCRC at the core of planning and service delivery and integrates children’s rights into every aspect of decision-making, policy and practice. The Right Way focuses on three main them Participation, Provision and Protection.

Protected characteristics	Will the proposal have any positive impacts on the Children’s Rights Approach?	Will the proposal have any negative impacts on the Children’s Rights Approach?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<b>Participation</b> (child or young person as someone who actively contributes to society as a citizen)	Yes	No	Having a localised provision for pupils will enable them to stay in the Blaenau Gwent Borough for their education supporting the Citizenship approach.
<b>Provision</b> (the basic rights of children and young people to survive and develop)	Yes	No	Should this proposal be approved, ALN pupils needs will be met and help them develop.
<b>Protection</b> (children and young people are protected against exploitation, abuse or discrimination)	No	No	

## Section 7– Community Safety

### Duty to Consider Crime and Disorder Implications

Section 17 of the Crime and Disorder Act 1998 places a duty on the local authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder, anti-social and other behaviour adversely affecting the local environment, the misuse of drugs, alcohol and other substances, re-offending and serious violence.

Impacts	Will the proposal have any positive impacts on crime and disorder?	Will the proposal have any negative impacts on crime and disorder?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<b>Crime</b> (consider impact on each: victims, offenders and neighbourhoods)	No	No	
<b>Anti-Social Behaviour and behaviour adversely affecting the local environment</b> (consider impact on each: victims, offenders, neighbourhoods and green spaces)	No	No	
<b>Misuse of drugs, alcohol and other substances</b>	No	No	

(Think vulnerable children, adults, families and communities)			
<b>Re-offending</b> (Think young people and adults, victims, families, communities)	No	No	
<b>Serious Violence</b> (Think vulnerable young people, vulnerable adults, victims, families, communities)	No	No	
<b>Counter Terrorism</b> (People and places that are vulnerable to terrorism or violent extremism)	No	No	
<b>Community Cohesion</b> (Asylum seekers, Migrants, Victims or Hate Crime, Community tensions)	No	No	

**Section 8- Armed Forces Covenant Duty** [AFC Draft Statutory Guidance - Final.pdf](#)

Impacts	Will the proposal have any positive impacts on the armed forces community?	Will the proposal have any negative impacts on the armed forces community?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<p><b>Health</b></p> <ul style="list-style-type: none"> <li>• Provision of services</li> <li>• Planning and funding</li> <li>• Co-operation between bodies and professionals</li> </ul> <p>These healthcare functions are within scope of the Duty in the following settings:</p> <ul style="list-style-type: none"> <li>• NHS Primary Care services, including general practice, community pharmacies, NHS dental, NHS optometry services and public health screening services.</li> <li>• NHS Secondary Care services, including urgent and emergency care, hospital and community</li> </ul>	No	No	

<p>services, specialist care, mental health services, and additional needs services (as applicable).</p> <ul style="list-style-type: none"> <li>• Local authority-delivered healthcare services, including sexual health services and drug and alcohol misuse services</li> </ul>			
<p><b>Education</b></p> <ul style="list-style-type: none"> <li>• Admissions</li> <li>• Educational attainment and curriculum</li> <li>• Child wellbeing</li> <li>• Transport</li> <li>• Attendance</li> <li>• Additional needs support</li> <li>• Use of Service Pupil Premium funding (England only)</li> </ul> <p>These education functions are within scope of the Duty in compulsory education settings, that is, primary, secondary, and, for England only, compulsory further education. The Duty does not cover nursery (early years education), higher education, or other</p>	No	No	



voluntary adult education settings			
<b>Housing</b> <ul style="list-style-type: none"> <li>• Allocations policy for social housing</li> <li>• Tenancy strategies (England only)</li> <li>• Homelessness</li> <li>• Disabled Facilities Grants</li> </ul>	No	No	

**Section 9-Data-Please outline any data or evidence that has been used to develop the proposal, this can be previous consultations, local/national data, pilot projects, reports, feedback from clients etc.**

<b>Data/evidence –What data/evidence was used? - provide any links.</b>	<b>What were the key findings?</b>	<b>How has the data/evidence informed this proposal?</b>
<p>Previous 5 year of numbers on roll for Resource Bases Projections for demand over the next 5 years for Resource Bases</p>	<p>The capacity for Resource Bases across the County Borough are 98% full with only 1 or 2 places in primary and secondary available</p> <p>The cost for sending pupils out of county for their education is high and should this proposal proceed, there will be opportunities for pupils to be educated in provision in county with a cost reduction.</p>	<p>The data provided has enabled the level of demand to be realised for the next 7 years.</p> <p>Cost Savings can be made to the Council by providing this proposal, however, the most important factor is that pupils of Blaenau-Gwent where possible will be education in Blaenau Gwent (a Local Solution) for sustainability of the school estate.</p>

**Are there any data or information gaps and if so what are they and how do you intend to address them?**

None

**Section 10-Consultation. Please provide details of consultation undertaken to support the proposal. Please consider the Gunning Principles: -**

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision

**Briefly describe any planned consultations or consultations that have been carried out to date. Please consider the above principles.**

**Please consider the following questions; -**

**1. Who did you consult?**

Formal consultation will be undertaken with all relevant stakeholders in order to gather their views. The consultee list complies with the Welsh Governments School Organisation Code, November 2022 Version 2

**2. When did the consultation take place and was adequate time given for a response?**

- The consultation is due to commence if approved by Cabinet Monday 24<sup>th</sup> April to Tuesday 6<sup>th</sup> June (this is in compliance with the above School Organisation Code and its (formal 42 consultation period )
- Once concluded an Outturn report will be developed and submitted to Cabinet for approval to proceed to the Statutory Notice Period which will also be in compliance with the School Organisation Code (28 days plus the day it was published)
- Once the Statutory Notice Period has concluded a formal Objections report will be produced and submitted to the Cabinet

- If the proposal to implement is approved by Cabinet a Decision Notification response will be produced and sent around to inform consultees of decision to implement.

**3. Was there enough information provided to respond effectively?**

A full consultation document was created in line with the School Organisation Code above, stipulation what information needs to be included, the Education Team also have/are in the process of arranging Drop in sessions in the 4 areas of Blaenau Gwent. Abertillery/Brynmawr/Ebbw Vale/Tredegar as well as JCC and Scrutiny. Further meetings and events are planned to capture the views of the Children & Young People.

**4. What were the findings?**

n/a

**5. Have the findings been considered in regards to the decision?**

n/a

**Section 11-Monitoring and Review**

<p><b>How will the implementation of the proposal be monitored, including the impacts or changes made?</b></p>	<p>The Inclusion Team will support the schools identified in this proposal to develop their ALN Resource Bases on a phased implementation. The Education Transformation team will support with the transformation change areas of the school(s) to accommodate this proposal. Annual reports to DMT, CLT Scrutiny and Cabinet</p>
<p><b>What monitoring tools will be used?</b></p>	<p>Inclusion team have monitoring tools developed to support pupils and an ALN panel is established to place pupils in the right environment for their needs. Such as Resource Bases/Specialist schools.</p> <p>Data analysis and budget availability/challenges will dictate future policy development.</p> <p>Education Transformation Team use Prince 2 Methodology to support any project implemented.</p>
<p><b>How will the results be used for future development?</b></p>	<p>Annual reports, Planning of School Places in Mainstream education are reviewed annually by the Education Transformation Team Facilities Officer, this in conjunction with the Inclusion team ALN Panel will ensure that the right provision for the right pupil is in place across the County Borough</p>


<b>How and when will it be reviewed?</b>	An ALN review takes place annually by the Inclusion Team and pupils that require additional support will be discussed at ALN Panel.
<b>Who is responsible for ensuring this happens?</b>	Service Manager for Inclusion

**Section 12 - Decision**

*Using the information you have gathered from sections 1-9 please state in the table below whether you are able to proceed with the proposal.*

Continue with the proposal in its current form	Yes <input checked="" type="checkbox"/> x	No <input type="checkbox"/>
Continue with proposal but take into account reasonable steps to mitigate any negative impacts of the proposal	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Name of person completing the IIA	
<b>Name:</b>	Sharon Rowlands
<b>Job Title:</b>	Education Transformation Team Sustainable Communities for Learning Officer
<b>Date:</b>	13.4.23

<b>Head of Service Approval</b>			
<b>Name:</b>	<b>Joanne Watts</b>		
<b>Job Title:</b>	<b>Service Manager for Education Transformation and Business Change</b>		
<b>Signature:</b>		<b>Date:</b>	<b>18.4.23</b>

Please contact Policy & Partnerships should you require any further advice or guidance on completing your assessment via [lissa.friel@blaenau-gwent.gov.uk](mailto:lissa.friel@blaenau-gwent.gov.uk) or [emma.scherptong@blaenau-gwent.gov.uk](mailto:emma.scherptong@blaenau-gwent.gov.uk).