

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 Well-being of Future Generations (Wales) Act 2015
- The Welsh Language (Wales) Measure 2011
- 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?

Mae'r ddogfen hon ar gael yn Gymraeg / This document is also available in Welsh

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>
Dale Sheals – Team Manager, Adaptations	Prevention and Inclusion	17/05/24	Caroline Ryan-Phillips

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

- | | |
|---|--|
| <input 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 style="border: 1px solid black; height: 50px; width: 100%;"></div> |

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

The Disabled Persons Adaptations Service section of the Council's Housing Renewal Policy, introduced in 2003, details adaptation grant streams offered by Newport City Council. As many years have passed since its introduction, it has become clear that the existing section requires revisions as various grant offers have changed.

The Adaptations Team, now based in Prevention and Inclusion Service Area, plans to replace the Disabled Persons Adaptations Service section of the Housing Renewals Policy with an Independent Living Team Policy. The aim and intended outcome of this decision is to clarify what grant aid is available and what conditions apply.

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 revision will impact all service users and their families who access adaptations, as the Independent Living Team provides mandatory adaptations.

Demographic data on service users who may need access to adaptations in Newport can be found in Table 1. While the proportion of people with Disability under the Equality Act has decreased, data indicates a slight increase in service users who may need to access adaptation services over the last ten years.

Table 1: Residents identifying as Disabled in 2011 and 2021

	2011	2021	Change
All Usual residents in Newport	145,720	159,595	13,875
Disabled Population	30,305	31,470	1,165
Percentage Disabled	21%	20%	-1%

Source: Office of National Statistics, Census of England and Wales, 2011 & 2021

Other stakeholders this policy revision may impact include internal staff requesting adaptation services and elected members.

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](#)

Initial internal consultation has been undertaken with key stakeholders across service areas, and comments have been considered and included where possible.

Wider engagement and consultation on the services delivered by the Independent Living Team have also been undertaken with Newport residents, including those who access adaption services. All points have been considered and implemented into the revised policy where possible. However, there are limitations due to what can be delivered under the legislation.

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

Feedback from Internal Stakeholders

Feedback from internal stakeholders has highlighted issues regarding waiver decision-making. To prevent delays, the proposed policy has been amended to allow the Service Managers and the Head of Service to determine a waiver request.

Resident's Feedback

Residents have commented that they would like further funding and additional adaptations provided under the new policy. However, the Council cannot consider this as a funding limit of £36,000, and the adaptations can be provided are both governed by the Housing Grant Construction Regeneration Act 1996.

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	
Age More Info	<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
Disability More Info	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The proposed policy revision may positively impact people who share this protected characteristic, particularly disabled people need adaptations.</p> <p>The Independent Living Team provides mandatory adaptations to all service users and their families in Newport requiring adaptations. The Independent Living Team Policy plans to replace the now outdated Disabled Persons Adaptations Service section of the Housing Renewals Policy and clarify what grant aid is available and what conditions apply. This change will ensure grant aid is easily available to all services users and any barriers to access are reduced.</p>
Gender Reassignment More Info	<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

Marriage or civil partnership More Info	<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
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Pregnancy or maternity More Info	<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
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Race More Info	<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
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Religion or Belief or non-belief More Info	<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
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Sex More Info	<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
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Sexual Orientation More Info	<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	
Welsh Language More Info	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Unlike the previous policy, the Independent Living Team Policy will be available equally in Welsh and English. This will support the Council in complying with the Welsh Language Standards under the Welsh Language (Wales) Measure 2011. Further support can be accessed by non English and Welsh speakers to access services via a translation service available.

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

All participants were offered the opportunity to participate in consultation on the proposed policy revision in Welsh and English.

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	
Armed Forces Community	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The proposed policy revision may positively impact the Armed Forces Community.</p> <p>Service users will be subject to a means test to access Disabled Facilities Grants. Under the Armed Forces Covenant, the Policy will disregard income received from the Armed Forces Compensation Scheme. The Independent Living Team Policy will ensure members of the Armed Forces Community are not disadvantaged because of any compensation received for injury during service when applying for an adaptation.</p>

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 decision to update the existing policy to a standalone policy will be able to meet short term needs along with long term need. The Housing Grant Construction Regeneration Act 1996 governs mandatory adaptation delivery and no scope to change delivery. If there is legislative or change of needs for residents, the policy can be reviewed again to ensure long term needs are safeguarded.

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 policy is in place to prevent hospital admission and promote independence of service users. There issue to address, just updating the existing policy to make it clear what grant aid is available.

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 resilient Wales*
- *A more equal Wales*
- *A Wales of more cohesive communities*
- *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.*

Providing adaptations under the proposed revised policy will make a positive impact upon Wales Well-being Goal of '**A healthier Wales**'. Adaptations provided will ensure service users '**physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood**'.

In addition to meeting Wales Well-being Goals, providing adaptations under the revised policy will also meet the Councils Well-being objective of '**Newport is a supportive city where communities and care are at the heart of what we do**'. An aim from the objective is to '**We will support individuals and carers to maintain their independence and support them when they need help by providing equitable access to early intervention and prevention support**'. Providing adaptations will assist with achieving the well-being objective goals of the Council.

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?

Delivery of adaptations requires collaborative working with the Council's Occupational Therapy Team and the use of external contractors that have been procured. Working in collaboration with both under the existing and proposed policy will enable the Independent Living Team to deliver on Wales Well-being Goal of '**A healthier Wales**' and the Council's objective of **Newport is a supportive city where communities and care are at the heart of what we do**'.

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?

Stakeholders that will be affected by the proposed new policy are service users and their families. Service users are always involved and feedback is continually received when delivering adaptations. This will ensure that participation is achieved that can inform service delivery under the proposed policy. Further engagement and participation is being reviewed so that more data can be collected in the future. The whole of Newport is served based on need in diverse locations.

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.

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	-	-	P2	-	-	-	-P3
Low income households without dependent children	-	-	P2	-	-	-	P3
Unemployed young people	-	-	P2	-	-	-	P3
Long term unemployed	-	-	P2	-	-	-	P3
Homeless households	-	-	N3	-	-	-	-
Refugees, migrants and asylum seekers	-	-	N3	-	-	-	-
Deprived neighbourhoods - WIMD rank in 10% most deprived LSOA	-	-	P2	-	-	-	P3
People on Universal Credit / income related benefits	-	-	P3	-	-	-	P3
Adults with no qualifications or low qualifications	-	-	P1	-	-	-	P3
People living in low quality housing or in Houses of Multiple Occupation	-	-	P1	-	-	-	P3

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.

The proposed policy review is anticipated to reduce inequalities of outcome for some groups that are likely to experience socio-economic disadvantage against the areas of health and physical environment. However, under the Housing Grant Construction Regeneration Act 1996, Refugees, Migrants and Asylum seekers along with Homeless households are not eligible for Mandatory adaptations. However, the team will work with the Housing department, particularly the Vulnerable Person Relocation team and the migration policy officer. Joined up working has ensure the identified client base can be supported outside of adaptation delivery.

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.

The proposed Independent Living Team Policy will not contribute to a negative cumulative impact.

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
Socio-economic impacts	Although there are no opportunities to access adaptations under the Housing Grant Construction Regeneration Act 1996, the team will work with the Housing department, particularly the Vulnerable Person Relocation team and the migration policy officer. Joined up working has ensured the client base can be supported outside of adaptation delivery.	Collate declined adaptation requests that is referred onto housing and report back to senior management.	Dale Sheals

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