

Caerphilly 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 whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles
- Well-being of Future Generations (Wales) Act 2015
- Welsh Language (Wales) Measure 2011

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. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

1. Proposal Details

Lead Officer	Head of Service	Service Area & Department	Date
Sarah Ellis	Keri Cole	Education / Inclusion and ALN	27.2.25

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>Development of specialist resource base provision to meet additional learning needs in light with statutory duties linked to the Additional Learning Needs (ALN) and Tribunal Act (2018).</p> <p>The Council is committed to supporting inclusion however recognises the need for a few children to access provision through specialist settings in line with their needs identified in their individual development plan (IDP).</p>

The current demand as identified through panel process, consultation with schools and LA staff, scrutiny of IDP's and scrutiny of data shows that there is a need for an increased number of specialist resource bases (SRB's) attached to mainstream schools across the County Borough, and therefore the number of places for children with ALN within specialist provision.

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.

<u>Protected Characteristics</u>	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>	The proposal seeks to focus on the development of additional resource bases designed to support children with more complex additional learning needs and those with Autistic Spectrum Disorder (ASD) and provision through the medium of Welsh at secondary. The proposal does not have any impact on age as a protected characteristic since the provisions will be developed to meet the needs of age groups from foundation phase to KS4.	The proposal does not have any negative impact on age as a protected characteristic.	Additional Learning Needs occur across the age ranges and in line with the ALN and Tribunal Act the responsibility is to support appropriate additional learning provision across the ages from 0-25
Disability <i>(people with disabilities/ long term conditions)</i>	The focus of the development is linked to the development of specific provision for complex needs and ASD which has a positive impact on the most complex children who require their needs to be met through specialist provision. Other provisions such as Trinity Fields exist to meet the most complex needs.	The proposal has a positive impact on children with a range of complex needs and ASD.	As above
Gender Reassignment <i>(anybody who’s gender identity or gender expression is different to the sex they were assigned at birth)</i>	N/A	N/A	N/A

Appendix 2

Marriage or Civil Partnership (<i>people who are married or in a civil partnership</i>)	N/A	N/A	N/A
Pregnancy and Maternity (<i>women who are pregnant and/or on maternity leave</i>)	N/A	N/A	N/A
Race (<i>people from black, Asian and minority ethnic communities and different racial backgrounds</i>)	N/A	N/A	N/A
Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)	N/A	N/A	N/A
Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)	N/A	N/A	N/A
Sexual Orientation (<i>lesbian, gay, bisexual, heterosexual, other</i>)	N/A	N/A	N/A

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*
- *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*

<u>Socio-economic Disadvantage</u>	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?
Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	The proposal does not have any impact of families of low income or living in poverty.	The proposal itself does not have any negative impact. However, if the proposals were rejected the LA would not be compliant with its statutory duties as defined in the ALN Act 2018.	Provision is developed for children have additional needs that meet the criteria for provision irrespective of income
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</i>	As above	As above	As above

Appendix 2

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

4. Corporate Plan – Council’s Well-being Objectives

(How does your proposal deliver against any/all of the Council’s 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?) [Corporate Plan](#)

Objective 1 - Enabling our Children to Succeed in Education	The development of a range of additional resource bases will complement existing provision and ensure appropriate additional learning provision (ALP) is delivered for children with ALN. It will ensure there is a focus on supporting all children to have access to high quality teaching and learning, and appropriate intervention, thus enabling them to reach their full potential in education.
Objective 2 - Enabling our Residents to Thrive	Ensuring children have access to the most appropriate educational opportunities supports their longer-term opportunities.
Objective 3 - Enabling our Communities to Thrive	As above
Objective 4 - Enabling our Economy to Grow	As above
Objective 5 - Enabling our Environment to be Greener	N/A





4a. Links to any other relevant Council Policy


(How does your proposal deliver against any other relevant Council Policy?)

The proposal aligns with the LA's Statutory duty to keep provision under review and the following Council Policies:
 The Education Strategy – Pursuing Excellence Together
 The Corporate Plan
 The Safeguarding Corporate Plan

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)

<u>Ways of Working</u>	How have you used the Sustainable Development Principles in forming the proposal?
Long Term 	The proposal is aimed at creating a local solution for ensuring statutory duties in line with the ALN Act are complied with.
Prevention 	Without additional learning provision it is possible that children will not have their needs met close to home and will require provision outside of the borough.
Integration 	The proposals are likely to impact on transport services since children with additional learning needs who attend specialist resource bases are provided with transport.
Collaboration 	Compliance with the ALN Act is a statutory duty for education social services and health. All agencies are required to work together to ensure that children with additional needs access the provision that is required to meet those needs.

Involvement 	All parties have been consulted as outlined in the Scrutiny and Cabinet reports and the current consultation in line with the School Organisation Code 2018 (Welsh Government) and School Standards & Organisation (Wales) Act 2013
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6. Well-being of Future Generations (Wales) Act 2015

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
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>	The proposals seeks to ensure that appropriate educational provision is developed for children with ALN thus ensuring they have access to high quality teaching and learning and interventions which support their educational development and future opportunities.
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>	N/A
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>	Ensuring that children's needs are met contributes to improved wellbeing and resilience.
A More Equal Wales	As above

<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>	
A Wales of Cohesive Communities <i>Attractive, viable, safe and well-connected communities</i>	NA
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>	See Section 7 regarding Welsh medium education provision in SRBs
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>	NA

7. 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 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) [Policy Making Standards - Good Practice Advice Document](#)



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? e.g the WESP, TAN20, LDP, Pupil Level Annual School Census
Links with Welsh Government's Cymraeg 2050 Strategy and CCBC's Five Year Welsh Language Strategy 2022-2027 and the Language Profile	Positive impact in relation to the development of specialist resource base provision through the medium of Welsh at Secondary. Specialist provision is already developed at primary. This will ensure that children with complex additional learning	No negative impacts	ALN Act Estyn reviews regarding ALN implementation Welsh in Education Strategic Plan

	needs can have their needs met through the medium of Welsh.		
Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i>	N/A		
Opportunities to promote the Welsh language e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community			
Opportunities for persons to use the Welsh language e.g. staff, residents and visitors	Positive as above. The development of the Welsh medium provision at secondary will continue to support opportunities for children with complex additional learning needs through the medium of Welsh	No negative impact	
Treating the Welsh language no less favourably than the English language	Positive as above	No negative impact	

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 proposal supports the development of specialist provision for children with ALN through the medium of Welsh.

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.)

Data/evidence <i>(Please provide link to report if appropriate)</i>	Key relevant findings	How has the data/evidence informed this proposal?
<p>Data from ALN panel regarding referrals for provision.</p> <p>Data from Transition panel.</p> <p>Scrutiny of information gathered via planning meetings and person-centred planning (PCP) reviews with schools.</p>	<p>There is an increased demand for specialist provision. More children have complex additional learning needs that cannot be met through provision developed within mainstream schools.</p> <p>The range of existing specialist provision across the Borough is at capacity.</p>	<p>The information available supports the needs for further development of specialist provision across the Borough this ensuring compliance with the ALN Act and ensuring children have their needs met within the Borough.</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.*

Relevant information has been considered.

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. Where it has been determined that consultation is required, [The Gunning Principles](#) must be adhered to. [Consider the Consultation and Engagement Framework](#). Please note that this may need to be updated as the proposal develops and to strengthen the assessment.

Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.
<p>Scrutiny and Cabinet have been consulted regarding the proposals and Scrutiny Members are consultees in relation to taking the proposals forward in line with the School Organisation Code 2018 (Welsh Government) and School Standards & Organisation (Wales) Act 2013</p> <p>Head Teachers and Chairs of Governors, and the head of the Diocese for Cardiff have been consulted on the proposals to seek permission to consult.</p> <p>The broader community of the schools involved will be involved in responding to the formal consultation and feedback collated for consideration by Cabinet.</p> <p>Yes in line with consultation process set out in the Schools Organisation Code (2018)</p> <p>Scrutiny and Cabinet endorsed the proposal to consult</p> <p>The outcome of the consultation will be collated following the formal consultation period.</p>

10. *Monitoring and Review*

How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?	The LA has a statutory duty to keep provision under review in accordance with the ALN Act (2018).
What are the practical arrangements for monitoring?	LA officers will continue to review data and the criteria for specialist provision

How will the results of the monitoring be used to develop future proposals?	Development of further provisions will be based on thorough analysis over time.
When is the proposal due to be reviewed?	Ongoing in line with statutory duty to keep provision under review
Who is responsible for ensuring this happens?	Inclusion teams

11. Recommendation and Reasoning

X	Implement proposal with no amendments
..	Implement proposal taking account of the mitigating actions outlined
..	Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage

Have you contacted relevant officers for advice and guidance?

Yes **..X** No **..**

12. Reason(s) for Recommendation

(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the “Summary of Integrated Impact Assessment” section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).

It is recommended that the proposals to develop specialist resources bases are implemented. Without the development the LA will not be compliant with its statutory duties in line with the ALN Act 2018 and children with complex additional learning needs will not have access to the additional learning provision they require.

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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	Sarah Ellis	First draft	27.2.25
2	Sarah Ellis	Update following consultation with equalities officer	14.5.25

Integrated Impact Assessment Author

Name:	Sarah Ellis
Job Title:	Lead for Inclusion and ALN
Date:	14.5.25

Director Approval

Name:	Keri Cole
Job Title:	Director of Education
Date:	14.5.25