

Integrated Impact Assessment (IIA) (including equality, environment, health, human rights, socio-economic Duty, United Nations Conventions the Rights of the Child and Welsh language

Name of Policy or Practice	Climate change strategy detailing measures to decarbonise the council's assets, activities and services and those of the wider community in its contribution to Welsh Government's target for the public sector to be carbon neutral by 2030.		
Responsible Officer (responsible for the Policy or Practice)	Chief Officer PEE		
Service / Portfolio	PEE	Start Date of Assessment	18 th Jan 2022

Name of officer(s) (and partners) completing the IIA		
Name(s)	Job Title(s)	Signature(s)
Alex Ellis	Climate Change Programme Manager	A Ellis

*Consider including only job titles when publishing

Document Version	Revision Date	Briefly Describe the Changes

IIA Approved by Responsible Officer / Portfolio / Service / Committee	
Date IIA Concluded	
Name	
Job Title	
Signature	

Introduction

This document is a multi-purpose tool ensuring the appropriate steps are taken to comply with the [Public Sector Equality Duty \(PSED\)](#) Equality Impact Assessment legislation and to demonstrate that we have shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the [Socio-economic Duty](#). It also incorporates [Welsh Language impacts](#), environmental and bio-diversity impacts, health impacts and United Nations Conventions Rights of a Child.

When we plan to introduce a new, or revise an existing, policy, strategy or practice, develop a new service, make changes or cuts to a service or make strategic decisions, we are required to consider if the decision would have a disproportionate impact on people sharing one or more [protected characteristic](#) or whether it could create inequalities of outcome around socio-economic disadvantage. Where this is likely to be the case, we must take appropriate action. The IIA process is not intended to prevent us doing things but to ensure we have considered the impact. It helps us focus on the actions we can take to remove and/or mitigate any disproportionate or discriminatory impact and introduce measures to advance equality of opportunity.

To comply with the PSED [General Duty](#) and [Socio-economic Duty](#), we must have 'due regard' (or consciously consider the need) to: eliminate discrimination, advance equality of opportunity and foster good relations and to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage. The greater the relevance and potential impact, the higher the regard required by the duty. The General Duty will be more relevant to some functions than others and they may also be more relevant to some protected characteristics than others. Our duty must be exercised with rigour, an open mind and considered at a time when it can make a difference to our decisions. Policies with high relevance, such as strategic budgetary decisions, grant-making programmes, changes to service delivery (including withdrawal or reorganisation of services), and recruitment or pay policies should always be subject to an assessment for impact. For further guidance see [EHRC Assessing Impact Guidance](#). Our duty to comply with this legislation cannot be delegated.

This form should demonstrate the steps taken to carry out the assessment including relevant engagement/consultation, the information taken into account, the results of the assessment and any decisions taken in relation to those results. The IIA should be published where it shows a substantial (or likely) impact on our ability to meet the PSED.

Benefits of undertaking an IIA:

- Gain a better understanding of those who may be impacted by the policy or practice
- Better meet differing needs and become more accessible and inclusive
- Enable planning for success – identifies potential pitfalls and unintended consequences before any damage is done
- Enable improved planning that will make decisions proactive rather than reactive, avoid having to reverse decisions which could have cost and reputational implications
- Demonstrate decisions are thought through and have taken into account the views of those affected
- Enable us to manage expectations by explaining the limitations within which we are working (e.g. budget)
- Help avoid risks and improve outcomes for individuals

- Remove inappropriate or harmful practices and eliminate institutional discrimination
- Ensure we put Welsh and English Language on an equal footing. and that decisions are made that safeguard and promote the use of the Welsh language
- Improve and protect health, maximising health benefits and reducing health risks
- Be more open and transparent
- Use our resources more effectively

Whilst this document may seem lengthy, as well as containing the necessary steps in the process, it also contains guidance notes in the key areas to assist you in undertaking the IIA. Additional links to further information are also included for assistance. Further information can be found on NHS/ WLGA PSED/ EIA [here](#).

The Welsh Government¹ guidance states that:

Impact assessment prompts and guides us to gather, and if necessary, seek evidence so as to improve the development of a policy or delivery plan, or inform a change of direction in policy or delivery. It is a methodology to help in the development and implementation of policy, rather than templates with tick boxes and checklists.

Integrated Impact Assessment Steps

- Step 1 - Identify the Main Aims and Objectives of the Policy or Practice
- Step 2 - Data, Engagement and Assessing the Impact
- Step 3 - Procurement and Partnerships
- Step 4 - Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice
- Step 5 - Decision to Proceed
- Step 6 - Actions and Arrangements for Monitoring Outcomes and Reviewing Data
- Step 7 - Publishing the Integrated Impact Assessment

Important Note to Completing Officer(s):

It is important that the IIA is completed when the policy or practice is being developed so that the findings from the IIA can be used to influence and shape the policy or practice. It is recommended as a minimum, it is completed by a lead officer who is responsible for the policy or practice, a subject matter expert and a critical friend with at least one who has received formal IIA training. This document needs to be presented to the decision makers along with the draft policy or practice as part of the decision making process.

¹ Welsh Government Integrated Impact Assessment Guidance

Where you are developing a high level strategy or plan that does not contain sufficient detail to show how it will impact on individuals or groups (i.e. where there will be plans and actions sitting beneath the strategy that will determine this), you should still undertake the Impact Assessment. You may also need to complete additional IIA(s) on the plans and actions beneath the high level strategy. This will ensure you demonstrate that you have shown due regard to complying with the [General Duty](#), the [Public Sector Equality Duty](#), the [Welsh Language Standards](#) the [Socio-economic Duty](#), the Human Rights Act, the United Nations Conventions, Rights of the Child.

If your policy or practice is as a result of a UK, Welsh Government or Local Authority wide directive, you should still assess the impact of this locally to identify any differential impact due to local difference.

You should consider whether other events, e.g. COVID-19, Brexit, Black Lives Matter, etc. have highlighted or exacerbated inequalities that need to be addressed as you work through the IIA.

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? *(Please double click on the relevant box(es) (X) and select 'checked' as appropriate)*

- New and revised policies, practices or procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff, e.g. early years provision, care, education
- Efficiency or saving proposals, e.g., resulting in a change in community facilities, activities, support or employment opportunities
- Setting budget allocations for new financial year and strategic financial planning
- Decisions affecting service users, employees or the wider community including (de)commissioning or revised services
- New project proposals affecting staff, communities or accessibility to the built environment, e.g. new construction work or adaptations to existing buildings, moving to on-line services, self-service, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation (refer to any national IIA and consider local impact)
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Service Boards which impact on a public bodies functions
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other please explain in the box below:

2. What are the overall aims, objectives and intended outcomes of the policy or practice?

The overall aim is for the Council to become carbon neutral by 2030. This aim is then broken down into specific decarbonisation targets for key themes across the Council's assets and services.

3. Who are the main consultative groups (stakeholders)?

Note: Consider communities of interest or place (where people are grouped together because of specific characteristics or where they live)

The main stakeholders are employees and members, however decarbonisation of the Council's services will also affect and involve other members of the public sector, the private sector, schools, colleges, universities, voluntary sector and the local community.

4. Is the policy related to, influenced by, or affected by other policies or areas of work (internal or external), e.g. strategic IIAs if this is an operational IIA and vice versa?

Note: Consider this in terms of statutory requirements, local policies, regional (partnership) decisions, national policies, welfare reforms.
This strategy links and complements the Council Plan's aims and existing Council strategies across all portfolios.

STEP 2 - Data, Engagement and Assessing the Impact

When completing this section, you need to consider if you have sufficient information with which to complete your IIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the IIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. The socio economic duty also requires us to **take into account the voices of those in the community including those with lived experience of socio economic disadvantage**. You should undertake engagement with communities of interest or communities of place to understand if they are more affected or disadvantaged by your proposals. This needs to be proportionate to the policy or practice being assessed. Remember that stakeholders can also include our own workforce as well as partner organisations.

Before carrying out particular engagement activities, you should first look to data from recent consultations, engagement and research. This could be on a recent related policy or recent assessments undertaken by colleagues or other sources, e.g., [Is Wales Fairer?](#), [North Wales Background Data Document](#), Info Base Cymru, WIMD. This can help to build confidence among groups and communities, who can see that what they have said is being acted on. If you have very little or no information from previous engagement that is relevant to this IIA, you should undertake some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group. It is seldom acceptable to state simply that a policy will universally benefit/disadvantage everyone, and therefore individuals will be affected equally whatever their characteristics. The analysis should be more robust than this, demonstrating consideration of all of the available evidence and addressing any gaps or disparities. Specific steps may be required to address an existing disadvantage or meet different needs.

The Gunning Principles, established from past court cases, can be helpful in ensuring we apply fairness in engagement and consultation:

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.

5. **Have you complied with the duty to engage as described above and are you sufficiently informed to proceed?**

Yes No *(please cross as appropriate X)*

6. **If Yes, what engagement activities did you undertake and who with?**

Public engagement survey open to all, young persons engagement exercise, internal workshops with members, academi and each portfolio. Results of all compiled into the strategy document.

7. **If No, you may wish to consider pausing at this point while you undertake (further) engagement activities which you can include in the action plan below.** Please incorporate any information obtained from this additional activity in the boxes in question 8.

Action	Dates	Timeframe	Lead Responsibility	Information added to IIA (✓)

8. **What information do you hold about the impact on each of the following characteristic and statutory considerations / duties from your experience of current service delivery and recent engagement or consultation?** Include any additional relevant data; research and performance management information; surveys; Government, professional body or organisation studies; Census data; Is Wales Fairer? (EHRC² data); complaints/compliments; service user data and feedback; inspections/ audits; socio-economic data including

² Equality and Human Rights Commission

WIMD³ data. You may wish to include sub-headings showing where each element of your data has come from, e.g. national data, local data, organisation data, general or specific engagement exercises, etc.

Consider any positive or negative impact including trends in data, geography (urban or rural issues), demography, access issues, barriers, etc. Also include any areas where there are inequalities of outcome resulting from socio-economic disadvantage or other relevant issues identified by communities of interest or communities of place (i.e. where stakeholders, service users, staff, representative bodies, etc. are grouped together because of specific characteristics or where they live) and any issues identified for people living in less favourable social and/or economic circumstances.



Prompts for
Equality Impact Asses

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
Age	All protected characteristics will benefit from decarbonisation activities not least in the area of Climate Change with associated benefits particularly in flooding events. Decarbonisation of the Council’s activities and services will require long term planning and a long term vision to ensure systems and services are fit for purpose as the climate changes as well as reducing the impact of harmful climate change through mitigation. Decarbonisation activities such as planting trees and developing renewable energy will have long lasting impacts over tens to hundreds of years. These activities also contribute to the climate change targets set by Welsh Government particularly Wales generating 70% of its electricity demand from renewable	Positive	Older People Children Young People Working Age People Young Families Demographics NB: Where children / young people are affected complete the Childrens Rights Checklist United Nations Convention on the Rights of the Child (UNCRC) Caring responsibilities

³ Wales Index of Multiple Deprivation


Equality and Human Rights

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
	energy by 2030 and becoming a net zero carbon nation by 2050. This gives longevity and resilience to future generations as well as supporting other age groups from today's actions. Alternative options for the use of public transport will particularly benefit those traditional high user groups in the older age and teenage groups.		
Disability	The Mobility & Transport theme provides provision of alternative travel options and accessibility to active travel routes. Investment in travel hubs and centralisation of common services to enhance accessibility to these. Management and development of Green Spaces to enhance and promote health and wellbeing and include accessibility for all.	Positive	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities, induction loops, signage Access to communication methods, use of British Sign Language, Easy Read Carers Dietary requirements Other Long Term Health Conditions United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
Gender Reassignment		Neutral	A person who proposes to, starts or has changed their gender identity Transgender Appropriate language use, i.e. gender neutral language, appropriate pronouns Gender neutral changing facilities and toilets confidentiality


Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
Marriage & Civil Partnership		Neutral	Marital status Civil Partnership status Reference to partners and not assuming husband and wife relationships /terminology
Pregnancy & Maternity		Neutral	Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers Access to breast feeding facilities Dress codes/uniforms- do they accommodate pregnant women
Race		Neutral	Consider Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Use of plain language Refugee / Asylum Seekers Migrants Positive Action Awareness events United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)
Religion & Belief		Neutral	Faith Communities Non Beliefs Dietary requirements Vegetarianism/Veganism Other philosophical beliefs Dress code/uniforms Religious festivals/activities Buildings – access to prayer room facilities

Equality and Human Rights

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
Sex		Neutral	Men / Women Gender Identity Toilet facilities/baby changing Childcare Gender Pay Gap Sex workers United Nations Convention on the Elimination of All Forms of Discrimination against Women (UNCEDAW)
Sexual Orientation		Neutral	Gay Lesbian Bi-sexual Heterosexual Terminology - Avoid making assumptions about a person's sexual orientation use gender-neutral terms such as partner(s). Confidentiality about sexuality Further resources available from Stonewall Cymru
Socio-economic Considerations- Reducing inequalities caused by socio-economic disadvantage	Lots of cross theme activities within the strategy including: Active travel routes linking rural communities Sustainable and alternative travel for rural communities Health benefits from active travel and from the promotion of our Green Spaces Reduction in anti-Social Behaviour through enhancement of our Green Spaces Community involvement in recycling schemes Development of Re-Use and Repair Cafes in local communities Engagement of community groups in recycling initiatives Use of volunteers to support the tree and woodland plan	Positive	People living in less favourable social and economic circumstances than others in the same society. Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries. 'Intersectionality' issues - where identity compounds socio-economic status, e.g., single parents (often women), disabled people, some BAME groups.

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
	Procurement from local sources and supply improving local economy, providing green jobs which upskills and reduces unemployment and poverty.		<p>Examples include lower levels of good health, lower paid work, poorer educational attainment and an increased risk of being a victim of crime</p> <p>Further resources available from Welsh Government including examples of inequalities of outcome caused by socio-economic disadvantage</p>  <p>Inequalities of outcome.pdf</p>
Human Rights		Neutral	See Human Rights Articles below. https://humanrightstracker.com/en/ on EHRC website
Other (please state)			E.g., Modern Slavery, Safeguarding, Other COVID effects, Carers, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless
Welsh Language			
Welsh Language	Bi-lingual communication promotes community engagement	Positive	Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information. Availability of Welsh speaking employees Technology

Equality and Human Rights

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
			<p>Rights of individuals to ask for WL services. Impact on Welsh speaking communities, including: Positive / negative effects on opportunities to use the WL. Possible changes to number/percentage of Welsh speakers Migration Job opportunities / Staffing changes. Training needs and opportunities Availability of Welsh medium education.</p> <p style="text-align: center;"> 20200921 DG S Policy making stand</p>

<p>Human Rights Act 1998</p> <ul style="list-style-type: none"> • Article 2 Right to life • Article 3 Freedom from torture and inhuman or degrading treatment • Article 4 Freedom from Slavery and forced labour • Article 5 Right to liberty and security • Article 6 Right to a fair trial • Article 7 No punishment without law 	<ul style="list-style-type: none"> • Article 8 Respect for private life, family, home and correspondence • Article 9 Freedom of thought, belief and religion • Article 10 Freedom of expression • Article 11 Freedom of Assembly and association • Article 12 Right to marry and start a family • Article 13 Right to access effective remedy if rights are violated • Article 14 Protection from discrimination
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Environment and Biodiversity

	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
Reducing greenhouse gas emissions	The strategy's key focus is decarbonising Council activities and services across key themes – Buildings, Procurement, Mobility & Transport, Land Use and Behaviour. All processes, services and procurement related to this strategy delivery will be in keeping with these aims.	Positive	Will energy need be met through renewable sources? Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? * Will it reduce ozone depleting emissions? Will it reduce emissions through retrofitting new technology? Will it reduce heat island effects on people and property?
Plan for future climate change	The strategy includes elements of climate change adaptation to improve sustainability of our communities as the climate changes. This includes provision and management of our habitats and green spaces, design of buildings with future weather changes in mind, production of renewable energy, provision of flood risk management and sustainable drainage systems, and support of a local economy to provide sustainability of food sources and other supplies.	Positive	Will it minimise flood risk from all sources of flooding? * Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? Will it reduce combined sewer overflow events? Will it encourage the re-use of resources? Will it encourage sustainable construction methods and procurement? Will it encourage water efficiency and drought resilience?
Pollution: air, water/ soil/noise and vibration and emissions	Move towards renewable energies diverts the need to burn fossil fuels, and promotion of ultralow emission vehicles and active travel all contribute to better air quality due to the reduction in air pollutants.	Positive	Will it reduce combined sewer overflow events? Will it improve air quality? * Will it reduce emissions of key pollutants? Will it reduce noise concerns and noise complaints? Will it reduce noise levels?
Integrating biodiversity into decision making	Maintenance and enhancement of green spaces and habitats to improve species richness is a key aim under the Land Use theme of the strategy. The strategy and its actions have been consulted on by the natural environment team to ensure it supports and enhances Section 6 and other biodiversity targets.	Positive	Have you considered the impacts and opportunities for action for biodiversity at early stages Are the impacts of procurement on biodiversity considered? Are products sourced sustainably?

	Carbon sequestration schemes will include tree planting which will also support the Urban tree and woodland plan.		Have the wider benefits of improved biodiversity been considered, flood prevention, health and wellbeing, recreation? Can you link with other strategies and initiatives for biodiversity e.g. FCC Environment and Sustainability policy, FCC Section 6 Plan, FCC Urban tree and woodland plan?
Increasing the resilience of our natural environment?	As above	Positive	Does the proposal work with nature and consider the use of nature based solutions first and foremost? Does your proposal support the creation of new habitats (in addition to any mitigation or compensation habitat) Does it contribute to the restoration of degraded habitats? Does it improve site management to improve nature value?
Improving understanding and raise awareness of the importance of biodiversity	Within the Behaviour theme of the strategy are requirements to ensure climate change and biodiversity are included in all Council decision making processes as well as provision of mandatory training for affected employees.	Positive	Can your proposal promote understanding of biodiversity? Can the delivery of public goods and services such as social care, community health and recreation promote biodiversity? Can your proposal promote biodiversity with partners/beneficiaries
Encouraging resource efficiency (energy, water, materials and minerals)	Energy efficiency is a key part of this strategy within our own assets and provision of support to homeowners and private sector.	Positive	Will it reduce water consumption and improve water efficiency? Will it reduce energy consumption? *
Reducing waste production and	Reduction of waste and increase of reuse and recycle is included in Land Use theme through development of recovery and refurb	Positive	Will it reduce consumption of materials and resources?

increase recycling, recovery and re-use of waste	services, improved kerbside recycling service and move towards a paperless Council.		Will it reduce household waste? Will it increase recycling, recovery and re-use? Will it reduce construction waste?
Reducing need to travel and promote sustainable forms of transport	Mobility & Transport theme focusses on the Council's own fleet decarbonisation, incentives for employees to cycle to work and salary sacrifice for ultralow emission vehicles. Move towards hybrid working and virtual meetings as a result of Covid-19 has reduced employee commuting and business mileage. Enhancement of public transport further reducing private vehicles.	Positive	Will it reduce volumes of traffic? Will it encourage walking and cycling?*
Improving the physical environment: housing, public space, access to and quality of green space	Improvements to housing, open space, the general landscape and access to all.	Positive	Will it reduce litter? Will it enhance the quality of public realm? Will it improve access and mobility for all equality groups Will it improve open space? Will it improve landscape character? Will it minimise development on Greenfield sites
Protecting and enhancing the historic environment and architectural, archaeological and cultural heritage	Any decarbonisation to historical and protected sites will be carried out sympathetically to enhance the site.	Positive	Will it protect heritage sites and cultural value? Will it protect strategic views? Will it protect listed buildings and their settings? Will it help preserve, enhance and record archaeological features and their settings?

Health

Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from  HIA_Tool_Kit_V2_W EB.pdf
	The strategy promotes access to active travel routes to encourage walking and cycling to improve health Reduction in carbon emissions into the atmosphere which improves air quality Access to greenspaces to encourage exercise Carbon sequestration through tree and woodland plan and the agricultural estate Cleaner fuel use and less car journeys	Positive	Diet Physical activity Use of alcohol, cigarettes, non-prescribed drugs Sexual activity Other risk-taking activity
Social and community influences on health			Family organisation and roles Citizen power and influence Social support and social networks Neighbourliness Sense of belonging Local pride Divisions in community Social isolation Peer pressure Community identity Language/Cultural and spiritual ethos Racism Other social exclusion
Mental well-being	Improved access and provision of green spaces has been proven to enhance mental wellbeing and resilience.	Positive	Does this proposal support sense of control? Does it enable participation in community and economic life? Does it impact on emotional wellbeing and resilience?

Living/environmental conditions affecting health			Built environment Neighbourhood design Housing Indoor environment Noise Air and water quality Attractiveness of area Green space Community safety Smell/odour Waste disposal Road hazards Injury hazards Quality and safety of play areas
Economic conditions affecting health			Unemployment Income Economic inactivity <input type="checkbox"/> Type of employment Workplace conditions
Access and quality of services			Medical services Other caring services Shops and commercial services Public amenities Transport including parking Education and training Information technology
Macr-economic, environmental and sustainability factors			Government policies Gross Domestic Product Economic development Biological diversity Climate

	Relevant data or information	Positive and/or negative impacts	Prompts (not exhaustive)
Relevant Article	Health benefits through less exposure to air pollution Access to clean and enhanced green spaces Access to active travel routes to encourage walking and cycling and the associated health benefits Reduction in waste to combat climate change		Summary of conventions

There are four articles in the convention that are seen as special. They're known as the "General Principles" and they help to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:	
Article 2	The Convention applies to every child without discrimination, whatever their ethnicity, sex, religion, language, abilities or any other status, whatever they think or say, whatever their family background
Article 3	(best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children.
Article 6	(life, survival and development) Every child has the right to life. Governments must do all they can to ensure that children survive and develop to their full potential
Article 12	2 (respect for the views of the child) Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example during immigration proceedings, housing decisions or the child's day-to-day home life

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

Note: If it is not possible to obtain this information now, you should include this in your action plan in Step 6 so that this information is available for future IIAs.

10. How does your proposal ensure that you are working in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011), to ensure the Welsh language is not treated less favourably than the English language, and that every opportunity is taken to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

All public facing media is available in welsh and english language to ensure equality as per the Welsh Language Standards.

11. **If this IIA is being updated from a previous version of a similar policy or practice, were the intended outcomes of the proposal last time achieved or were there other outcomes?** (Please provide details, for example, was the impact confined to the people you initially thought would be affected, or were other people affected and if so, how?)
12. **What is the cumulative impact of this proposal on different protected groups when considering other key decisions affecting these groups made by the organisation?** (You may need to discuss this with your Chief Officer or Cabinet Member to consider more widely if this proposal will affect certain groups more adversely because of other decisions the organisation is making, e.g., financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc)

13. **How does this proposal meet with each of the 7 goals of the Well-being of Future Generations (Wales) Act 2015?**

For more information, please see: <https://futuregenerations.wales/about-us/future-generations-act/>

14. **How does this proposal meet with the 5 ways of working of the Well-being of Future Generations (Wales) Act 2015 ?**

For more information, please see: <https://futuregenerations.wales/about-us/future-generations-act/>

15. **Describe any intended negative impact identified and explain why you believe this is justified** (for example, on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not or because of an objective justification¹ or positive action²)

Note¹: Objective Justification - gives a defence for applying a policy, rule or practice that would otherwise be unlawful direct or indirect discrimination. To rely on the objective justification defence, the employer, service provider or other organisation must show that its policy or rule was for a good reason – that is 'a proportionate means of achieving a legitimate aim'. A **legitimate aim** is the reason behind the discrimination which must not be discriminatory in itself and must be a genuine or real reason, e.g., health, safety or welfare of individuals. If the aim is simply to reduce costs because it is cheaper to discriminate, this will not be legitimate. Consider if the importance of the aim outweighs any discriminatory effects of the unfavourable treatment and be sure that there are no alternative measures available that would meet the aim without too much difficulty (proportionate) and would avoid the discriminatory effect.

Note²: Positive Action - Where an employer takes specific steps to improve equality in the workplace to address any imbalance of opportunity, lessen a disadvantage or increase participation in a particular activity, for example, increasing the number of disabled people in senior roles where they are under-represented by targeting specific

groups with job adverts or offering training to help create opportunities for certain groups. The public sector is expected to consider the use of positive action to help them comply with the Public Sector Equality Duty.

16. Could any of the negative impacts identified amount to unlawful discrimination but are perceived to be unavoidable (e.g., reduction in funding)?

Yes No Not Sure *(Please double click on the relevant box (X) and select 'checked' as appropriate)*

17. If you answered Yes or Not Sure to question 15, please state below, which protected group(s) this applies to and explain why (including likely impact or effects of this proposed change)

18. If you answered No to question 15, are there any barriers identified which amount to a differential impact for certain groups and what are they?

STEP 3 - Procurement and Partnerships

The Public Sector Equality Duty (PSED) requires all public authorities to consider the needs of protected characteristics when designing and delivering public services, including where this is done in partnership with other organisations or through procurement of services. The Welsh Language Standards also require all public authorities to consider the effects of any policy decision, or change in service delivery, on the Welsh language, which includes any work done in partnership or by third parties. We must also ensure we consider the Socio-economic Duty when planning major procurement and commissioning decisions to consider how such arrangements can reduce inequalities of outcome caused by socio-economic disadvantage.

When procuring works, goods or services from other organisations (on the basis of a relevant agreement), we must have due regard to whether it would be appropriate :

- for the award criteria for that contract to include considerations to help meet the General Duty (to eliminate discrimination, promote equality of opportunity and foster good relations);
- to stipulate conditions relating to the performance of the contract to help meet the three aims of the General Duty.

This only applies to contractual arrangements that are “relevant agreements” which means either the award of a ‘public contract’ or the conclusion of a ‘framework agreement’, both of which are regulated by the Public Sector Directive (Directive 2004/18/EC) which regulates the specified EU thresholds. Further information can be found [here](#).

We must consider how such arrangements can improve equal opportunities and reduce inequalities of outcome due to protected characteristics and caused by socio-economic disadvantage, particularly on major procurement and commissioning decisions. The PSED applies to the work that private sector organisations undertake when delivering a public function on our behalf. We therefore need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty under Section 149 of the Equality Act 2010. In the same way, the Welsh Language Standards applies to any work undertaken on behalf of, and in the name of, public bodies that are themselves subject to the Standards, and so consideration should be given to how these requirements are monitored and communicated through the procurement documents. The Socio Economic Duty does not pass to a third party through procurement, commissioning or outsourcing. Therefore when we work in partnership with bodies not covered by the Socio Economic Duty, the duty only applies to us as the relevant public body.

19 Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes No (Please double click on the relevant box (X) and select 'checked' as appropriate)

If No, please proceed to Step 4

20. If Yes, what steps will you take to comply with the General Equality Duty, Human Rights and Welsh Language Legislation and the Socio-Economic Duty in regard to procurement and/or partnerships? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation, showing how promotion of equality may be built into individual procurement projects
- On what you based your decisions in the award process, including consideration of ethnical employment and supply chain code of practice
- Ensure that contract clauses cover the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and socio-economic requirements as well as Welsh Language Duties (remember that any duties from the Welsh Language Measure 2011 and Welsh Language Standards are also applicable to services provided on your behalf under contract by external bodies).
- Performance and Monitoring measures are included to monitor compliance, managing and enforcing contracts

Partnerships

Be clear about who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessments
- Delivering the actions from the IIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners
- Demonstrating due regard to the Public Sector Equality Duty and the Socio-Economic duty

STEP 4 - Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

21. When considering proportionality, does the policy or practice have a significantly positive or negative impact or create inequalities of outcome resulting from socio-economic disadvantage?

(Please give brief details)

Significantly positive impact	Significantly negative impact

22. It is important that you record the mitigating actions you will take in developing your final policy/practice draft. Record here what measures or changes you will introduce to the policy or practice in the final draft which could reduce or remove any unlawful or negative impact or disadvantage and/or improve equality of opportunity/introduce positive change; or reduce inequalities of outcome resulting from socio-economic disadvantage? (This could also inform the Action Plan in Q30)

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the Policy/Practice	Completed (✓)

23. Will these measures remove any unlawful impact or disadvantage?

Yes No (Please double click on the relevant box (X) and select 'checked' as appropriate)

24. If No, what actions could you take to achieve the same goal by an alternative means?

25. What measures or changes in the following important legislative areas have you included to strengthen or change the policy/practice:

- a) to foster good relations and advance equality of opportunity as covered by the General Duty in the Equality Act 2010;
- b) to reduce inequalities of outcome as a result of socio-economic disadvantage;
- c) to increase opportunities to use the Welsh language and in treating the Welsh language no less favourably than the English language as set out in the Welsh Language (Wales) Measure 2011 and reduce or prevent any adverse effects that the policy/practice may have on the Welsh language?

26. Do you have enough information to make an informed judgement?

Yes No (Please double click on the relevant box (X) and select 'checked' as appropriate)

27. If you answered Yes, please justify:

28. If you answered No, what information do you require and what do you need to do to make a decision?
(Note: Should data collection be included in the action plan (Step 6)?)

[You may need to stop here until you have obtained the additional information]

STEP 5 - Decision to Proceed

29. Using the information you have gathered in Steps 1 – 4 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(Please double click on the relevant box (X) and select 'checked' as appropriate)

Decision	
<input checked="" type="checkbox"/> Yes	Continue with policy or practice in its current form
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement or to remove any areas of adverse impact identified in Step 4
<input type="checkbox"/> Yes	Continue with the plan as any detrimental impact can be justified
<input type="checkbox"/> No	Do not continue with this policy or practice as it is not possible to address the adverse impact. Consider alternative ways of addressing the issues.

30. Are there any final recommendations in relation to the outcome of this Equality Impact Assessment?

STEP 6 - Actions and Arrangements for Monitoring Outcomes and Reviewing Data

The IIA process is an ongoing one that doesn't end when the policy/practice and IIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced or amended this new policy or practice. If you do not hold relevant data, then you should be taking steps to rectify this in your action plan. To review the EHRC guidance on data collection you can review their [Measurement Framework](#).

31. Please outline below any actions identified in Steps 1-5 or any additional data collection that will help you monitor your policy/practice once implemented:

Action	Dates	Timeframe	Lead Responsibility	Add to Service Plan (✓)

32. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice including timescales for when it should be formally reviewed:

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)

STEP 7 - Publishing the Integrated Impact Assessment

Please arrange for this completed IIA to be agreed by your Chief Officer and arrange for translation and publishing with a copy sent to Stephanie Aldridge: stephanie.aldridge@flintshire.gov.uk.