

Equality Impact Assessment

See the leaflet *How to Make an Equality Impact Assessment* for help to complete this form. You are also welcome to contact Delyth Williams, Policy and Equality Officer on ext. 32708 or DelythGadlysWilliams@gwynedd.llyw.cymru, for further assistance.

The Council is required (under the Equality Act 2010) to consider the impact any changes in any policy or procedures (or the creation of a new policy or procedure) will have on people with protected equality characteristics. The Council also has additional general duties to ensure fairness and to foster good relationships. Therefore, a timely Equality Impact Assessment should be made before any decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).

I Details

I.1. What is the name of the policy / service in question?

Restructuring of Language Centres

I.2 What is the purpose of the policy / service that is being created or amended? What changes are being considered?

The budget for Language Centres in Gwynedd is insufficient from September 2019 onwards due to a cut from 10% from the Education Improvement Grant, together with an increase in costs (see 2.2 for the financial details)

OPTIONS

As a basis for the options to restructure the Language Centres in future, the Education Department formed the following criteria:

	PRINCIPLES	
1.	The restructuring will not affect the availability of the provision for latecomers (i.e. That the same number of pupils or more have access to the service)	✓
2.	Minimum staffing level of 2FTE at every Language Centre	✓

It is also noted that none of the following options include any change to the after-care provision, and after-care will be considered when moving forward with the preferred option for the future.

Option 1

- Close one Primary Language Centre
- Increase the capacity of every Language Centre to 19 learners
- A staffing structure of a Leader and a Teacher at every Language Centre

Option 2

- Every Language Centre to remain open.
- The capacity of the Dolgellau Language Centre increased to 16. The capacity of every other Language Centre to remain the same.
- A staffing structure of a Leader and a Teacher at every Language Centre

Option 3

- Every Language Centre to remain open.
- The capacity of the Dolgellau Language Centre increased to 16. The capacity of every other Language Centre to remain the same.
- One Leader for all Primary Language Centres, a staffing structure of a Teacher and an Assistant at every Language Centre (where the Leader is not based).
- A staffing structure of a Leader and an Assistant at the Secondary Language Centre

Option 4

- Every Language Centre to remain open.
- The capacity of the Dolgellau Language Centre increased to 16. The capacity of every other Language Centre to remain the same.
- One Leader for all Primary and Secondary Language Centres, a staffing structure of a Teacher and an Assistant at every Language Centre (where the Leader is not based).

I.3 Who is responsible for this assessment?

Debbie A.W. Jones, Education Corporate Services Officer

1.4 When did you commence the assessment? Which version is this?

March 2019 (Version 2)

2) Action

2.1 Who are the partners it will be necessary to work with to undertake this assessment?

- Gwynedd Language Centres Staff
- Union Representatives of the Teachers and Assistants
- Primary and Special Catchment Areas Consultative Group
- Secondary Strategic Planning Group
- Schools Funding Forum
- Unions' Forum
- Language Committee
- Education and Economy Scrutiny Committee

2.2. What steps have you taken to engage with people with protected characteristics?

In light of the budget shortfall from 2019/20 onwards for the Language Centres, a meeting was held with the staff on 10 September 2019 to notify them of the financial position of the Language Centres from 2019/20 onwards. During the meeting, staff were invited to come together to consider how the service could be restructured in future to meet the budget shortfall.

Following this meeting, we were notified that the Language Centre staff were not keen to create their own options for the service's structure in future. Rather, their wish was for the Education Department to consider and create options, with an opportunity for them to express their opinion and present comments on those options.

On 24 October 2018, a meeting was held between the Education Department, Human Resources, Language Centre staff, along with their Union representatives to present options for their consideration.

A Human Resources process for restructuring the Language Centres was followed, therefore consulting with the staff and the Unions on options for restructuring the service in future. A consultation period of 30 days was given to staff and unions, along with an extension of 10 days at the request of one particular union.

A questionnaire was sent to service users asking for their opinions on the provision. All responses supported the work of the Language Centres, believing that the service was "great". They also indicated that the Language Centres are successful in enabling children both to learn and use Welsh at their given schools. Service users were also asked whether any of the individual options affected themselves, their family or child in the context of specific equality characteristics. The respondents were equally divided as to the effect of the proposed changes in option 1 in relation to equality characteristics. However, the majority of respondents, did not consider that there would not be any effect as a consequence of implementing options 2, 3 and 4. An insufficient response was given for option 5 and therefore it was not possible to draw any conclusions from the data provided.

2.3 What was the outcome of the engagement?

A Human Resources process for restructuring the Language Centres was followed, therefore consulting with the staff and the Unions on options for restructuring the service in future.

The following is a summary of the Unions' observations:

UCAC

General observations:

Keep staffing levels at two teachers

The teachers must be:

- specialist for effective 'language immersion'
- enthusiastic and ambitious
- in possession of oral language of a good standard
- able to plan lively lessons that are carefully structured to conform to the course
- able to identify and respond to learners' needs (ALN, emotional and behavioural problems)
- training and support for teachers and school assistants
- knowledgeable of the latest developments in the field of education
- able to lead a centre in each other's absence

The Centres' Locations: Equal Opportunity - ensure that every school is within reasonable reach of the Language Centre.

The following is a summary of UCAC's observations on the individual options:

Option 1

STRENGTH	WEAKNESS
<ul style="list-style-type: none">• 2 specialist teachers• The success of the course and service is secured	<ul style="list-style-type: none">• Centre Ch closing will have an impact on the area (where the centre is based).• Increasing journeys from schools to the nearest Language Centre

	<ul style="list-style-type: none"> • A centre to remain in every area of Gwynedd • 1 area without a Language Centre • Losing specialist teaching jobs 	
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Option 2

STRENGTH	WEAKNESS
<ul style="list-style-type: none"> • The Centres' Locations - 1 in every area 	<ul style="list-style-type: none"> • Losing specialist teaching jobs • Increases the teacher : pupil ratio • The Leader's absence will cause disorder: <ul style="list-style-type: none"> - course structure - responsibility for the learner - transport - parents • A supply teacher cannot step in as a stranger • Losing opportunities to share good practice • Weakens the support for individual learners • The after-care strategy will be less effective

Option 3

In addition to the observations for Option 2:

STRENGTH	WEAKNESS
	<ul style="list-style-type: none"> • Centre A (The Leader's Centre) will be ineffective in light of the responsibility for all the Language Centres.

Option 4

In addition to the observations for Options 2 and 3:

STRENGTH	WEAKNESS
	<ul style="list-style-type: none"> • Centre A (The Leader's Centre) will be ineffective in light of the responsibility for all the primary and secondary Language Centres.

	<ul style="list-style-type: none"> • 1 Leader responsible for the primary and secondary without an understanding of one sector
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NEU

The following is a summary of NEU's observations:

- It is crucial to avoid excessive travel for pupils and this important principle cannot be kept should one of the centres close. (Oppose Option 1).
- The Leader's absence will cause disorder without a second teacher in terms of the course structure.
- A supply teacher cannot step in as a stranger.
- Object to any action on the increase in costs of £35,000 until there is clarity on the need to do so.

In addition, the NEU union asked:

- How does restructuring tie in with the Council's strategic objectives of promoting the Welsh language and the Welsh language policy?
- What discussions have been held with the primary and secondary headteachers?

Dolgellau Language Centre

Observations were received from the Leader and Assistant at Dolgellau Language Centre as part of the consultation.

Here are their observations on Option 2 - Leader and Assistant:

- We at the Dolgellau Language Centre have been operating Option 2, namely a teacher and an assistant since 2002, for 16 years, and it has been very successful.
- We are full with 100% of our capacity full each term, and at times we have more than the capacity of children (up to 10).
- We deliver the course requirements with a Teacher and Assistant. We are cost effective and cheaper than the other options under consideration.
- The Teacher presents the language learning work and the Assistant supports the learning. Both of us work together in the classroom.
- The Dolgarrog Language Centre works as a 'Leader and Senior Assistant', and they

accept up to 12 children and no more.

Observations from Stakeholders, Organisations and Individuals

As already noted, a Human Resources process was followed for restructuring the Language Centres, therefore consulting with the staff and the Unions on options for restructuring the service in future.

Nevertheless, the Education Department also briefed key stakeholders during the consultation period, including:

- Education and Economy Scrutiny Committee
- Schools Funding Forum
- Unions' Forum
- Primary and Special Catchment Areas Consultative Group
- Secondary Strategic Planning Group

Observations were also received from organisations and individuals, including:

- Cymdeithas yr Iaith Gymraeg
- Cylch yr Iaith
- Popeth Cymraeg
- CYDAG
- RHAG
- Town and Community Councils
- Individuals

The themes of the observations received from organisations and individuals include:

- Object to any change
- Quality (need for 2 teachers)
- Changing demography

2.4 On the basis of what other evidence do you operate?

Historically, the Language Centres were funded by a grant from the Welsh Language Board, with the Council providing match funding. When the Welsh Language Board was abolished, the Language Centres were funded in the same way through the Welsh Government's Welsh in Education Grant and the Council continuing to provide the match funding.

In 2015, Welsh Government brought 11 education grants together under the heading of the Education Improvement Grant (EIG) and this included Welsh in Education Grant. By now, Welsh Government funds the Welsh in Education Grant through the regional consortia (GwE), and every authority contributes match funding to the region, before the WEG is then transferred from the regional consortia back to the Authorities.

In 2018/19, Welsh Government cut the Education Improvement Grant by 10%. This means a shortfall of £61,000 in the Gwynedd Language Centres budget from 2018/19 onwards. This year, we succeeded in bridging this shortfall, although cuts have been made to other headings within the EIG, such as the Foundation Phase.

For 2019/20, the news we received from Welsh Government was better than expected for the EIG, i.e. confirmation of a neutral settlement for the EIG was received for 2019/20. However, in light of inflation to salaries and pensions, this means a further shortfall in the budget of approximately £35,000 from September 2019 onwards. The GwE Management Board and Joint-committee have not yet convened to agree on the exact allocation for the EIG headings for 2019/20.

At the same time, the GwE Management Board has also decided to carry out a regional review of the Welsh Language heading in the EIG, and this could affect the financial allocations given to the Welsh Language in individual authorities, especially given that the allocations are currently made on a historical basis only, with Gwynedd receiving much more money than any other county.

The staffing structure of the Language Centres is currently as follows:

Language Centre	Staffing Structure	Numbers
Dolgellau	Leader Assistant	8
Llangybi	Leader Teacher	16
Maesincla	Leader Teacher	16
Penrhyneddraeth	Leader Teacher	16
Secondary Eifionydd	Leader Teacher	16
	After-care teacher	

The trend for pupil numbers attending the Primary Language Centres over the last five years is as follows:

Pupil numbers at the Gwynedd Primary Language Centres per term 2013 – 2018					
TERM	Dolgellau	Llangybi	Maesincla	Penrhyn	Total
CAPACITY	8	16	16	16	
Spring 2013	6	7	13	11	37
Summer 2013	8	7	13	15	43
Autumn 2013	9	13	15	13	50
Total 2013	23	27	41	39	130
Spring 2014	8	8	14	15	45
Summer 2014	26*	4*	16	10**	64
Autumn 2014	8	10	14	14	46
Total 2014	42	22	44	47	155
Spring 2015	8	11*	11	14	44
Summer 2015	9	4*	15	15*	43
Autumn 2015	7	12	9	17	45
Total 2015	24	27	35	46	132
Spring 2016	8	10	13	16	47
Summer 2015	11	6	16	19	52
Autumn 2016	9	14	16	18	56
Total 2016	27	30	45	53	155
Spring 2017	10	13	13	15	51
Summer 2017	7**	10	17	17	51
Autumn 2017	8	13	17	16	54
Total 2017	25	36	47	48	156
Spring 2018	6 + 1*	14	15	11	47
Summer 2018	5 ** / 7 *	8	16	14	45
Autumn 2018	8	11	15	16	50
Total 2018	22	33	46	41	142

*after-care **pre Language Centre

Number of pupils at Eifionydd' Secondary Language Centre per term 2013-2018:

TERM	Eifionydd	TERM	Eifionydd
Spring 2013	16	Spring 2016	9
Summer 2013	17	Summer 2016	10
Autumn 2013	13	Autumn 2016	14
Total 2013	46	Total	33
Spring 2014	13	Spring 2017	18
Summer 2014	6	Summer 2017	8
Autumn 2014	21	Autumn 2017	16
Total 2014	40	Total	40
Spring 2015	8	Spring 2018	14
Summer 2015	13	Summer 2018	15
October 2015	13	October 2018	17
Total	34	Total	46

CONSULTATION

As a result, the Education Department developed 5 different options for the future restructuring of the service, consulting with staff and the unions on these options. (See 1.2 for details of the options).

2.5 Are there any gaps in the evidence that needs to be collected?

We have noted that we anticipate a further deficit of £35,000 in the grant from September 2019 onwards as a result of inflation and an increase in teachers' pension costs, although there is no clarity regarding the exact conditions at present.

Following the consultation with staff and the unions, together with briefing stakeholders, a concern was noted about the likelihood that losing the structure of 2 teachers would affect the quality of the provision. We currently do not have any evidence to prove or disprove this, therefore we will ensure robust arrangements for monitoring the quality of the Language Centres' provision going forward following any restructuring.

3) Identifying the Impact

3.1 The Council must give due attention to the impact any changes will have on people with the following equality characteristics. What impact will the new policy/service or the changes in the policy or service have on people with equality characteristics? You are welcome to add other characteristics if you wish.

Characteristics	What type of impact? *	In what way? What is the evidence?
Race (including ethnicity)	None	One of the principles of restructuring is to ensure that it does not affect the availability of the provision for latecomers (i.e. That the same number of pupils or more have access to the service). Therefore, it is anticipated that the outcome will be the same and, therefore, no impact on non-Welsh speaking latecomers from the rest of Britain or other countries is anticipated.
The Welsh language	None	One of the principles of restructuring is to ensure that it does not affect the availability of the provision for latecomers (i.e. That the same number of pupils or more have access to the service). Therefore, it is anticipated that the outcome will be the same, namely that they will get the same opportunity and support to acquire the Welsh language. There is no change to the purpose and essence of the Language Centres as a result of the re-structuring, namely to immerse latecomers in the Welsh language.
Disability	Negative / None	One of the principles of restructuring is to ensure that it does not affect the availability of the provision for latecomers (i.e. That the same number of pupils or more have access to the service). Therefore, it is anticipated that the outcome will be the same for latecomers, whether they have a disability or not. However, it is acknowledged that implementing Option 1 could specifically lead to having to travel further to reach the provision and, therefore, this Option could have a worse impact on some groups.
Gender	None	It is acknowledged that staff at the Language Centres are all women. The consultation noted that specialist post which was well paid for women (in this context) would be lost, with replacement posts paying less. However, no impact on service users is anticipated.
Age	None	One of the principles for the restructuring is to ensure there is no impact in the availability of the provision for latecomers (i.e. that the same number or more learners are able to access the service). Therefore, it is anticipated that the outcome for latecomers would be the same. It is

		acknowledged that children and young people are the service users at the Language Centres, and this is the only objective which was mentioned by users.
Sexual orientation	None	No impact on service users is anticipated for this equality objective.
Religion or belief (or non-belief)	None	No impact on service users is anticipated for this equality objective.
Gender reassignment	None	No impact on service users is anticipated for this equality objective.
Pregnancy and maternity	None	No impact on service users is anticipated for this equality objective.
Marriage and civil partnership	None	No impact on service users is anticipated for this equality objective.

* Delete as required

3.2 The Council has a duty under the Equalities Act 2010 to contribute positively to a fairer society through advancing equality and good relations in its activities in the fields of age, gender, sexual orientation, religion, race, transgender, disability and pregnancy and maternity. The Council must give due attention to the way any change affects these duties.

General Duties of the Equality Act	Does it have an impact?	In what way? What is the evidence?
Abolishing illegal discrimination, harassment and victimisation	No	One of the principles of restructuring is to ensure that it does not affect the availability of the provision for latecomers (i.e. That the same number of pupils or more have access to the service). Therefore, the change would not have an impact. The same number of children would have access to the service, and have the opportunity to acquire the Welsh language to enable them to assimilate with the bilingual society in Gwynedd, and to take full advantage of educational provision and experiences in accordance with the Education Language Policy.

Promoting equal opportunities	No	<p>One of the principles of restructuring is to ensure that it does not affect the availability of the provision for latecomers (i.e. That the same number of pupils or more have access to the service). Therefore, the change would not have an impact as an equal opportunity would remain for latecomers. The same number of children would have access to the service, and have the opportunity to acquire the Welsh language to enable them to assimilate with the bilingual society in Gwynedd, and to take full advantage of educational provision and experiences in accordance with the Education Language Policy.</p> <p>The consultation noted that specialist post which was well paid for women (in this context) would be lost, with replacement posts paying less.</p>
Encouraging good relationships	No	<p>One of the principles of restructuring is to ensure that it does not affect the availability of the provision for latecomers (i.e. That the same number or more learners have access to the service), therefore, the change would not have an impact as an equal opportunity would remain for latecomers. The same number of children would have access to the service, and have the opportunity to acquire the Welsh language to enable them to assimilate with the bilingual society in Gwynedd, and to take full advantage of educational provision and experiences in accordance with the Education Language Policy. Enabling latecomers to acquire the Welsh language would ensure they can foster good relationships with peers and the bilingual community in Gwynedd.</p>

* Delete as required

4) Analysing the results

4.1 Is the policy therefore likely to have a significant, positive impact on any of the equality characteristics or the General Duty? What is the reason for this?

Re-structuring the Language Centres is unlikely to have a significant, positive impact on any of the equality characteristics or the General Duty, as a result of the fact that availability of the provision for children is the same.

4.2 Is the policy therefore likely to have a significant, negative impact on any of the equality characteristics or the General Duty? What is the reason for this?

Re-structuring the Language Centres is unlikely to have a significant, positive impact on any of the equality characteristics or the General Duty, as a result of the fact that availability of the provision for children is the same.

4.3 What should be done?

Choose one of the following:

Continue with the policy / service since it is robust	<input checked="" type="checkbox"/>
Amend the policy to remove any barriers	<input type="checkbox"/>
Suspend and delete the policy as the detrimental impacts are too great	<input type="checkbox"/>
Continue with the policy as any detrimental impact can be justified	<input type="checkbox"/>

4.4 If you continue with the plan, what steps will you take to reduce or mitigate any negative impacts?

As a result of consulting with staff and the unions, as well as briefing stakeholders, a concern was noted that the likelihood of losing a two teacher structure would affect provision quality. We have no evidence to prove or refute this at present, therefore, we will ensure robust arrangements to monitor the quality of provision at Language Centres in future as a result of the re-structuring.

4.5 If you are not taking any further action to delete or reduce the negative impacts, explain why here.

N/A

5) Monitoring

5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?

As a result of consulting with staff and the unions, as well as briefing stakeholders, a concern was noted that the likelihood of losing a two teacher structure would affect provision quality. We have no evidence to prove or refute this at present, therefore, we will ensure robust arrangements to monitor the quality of provision at Language Centres in future as a result of the re-structuring.

We will also seek the opinions of service users on a regular basis, and we will adapt the impact assessment to reflect opinion and any additional information received.