

Aseiad Effaith Cyfansawdd

This document assesses what impact the policy, procedure, plan, etc. will have on the county's population and will be implemented based on a number of legislations.

- **Equality Act 2010.** The Act places a duty on public organisations to give due attention to the impact of any new (or amended) policy, procedure or plan, etc. on persons with protected characteristics. We are required to:
 - eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act.
 - promote equality of opportunity between people who share a relevant protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.

In Wales, the specific duty notes the need to undertake an impact assessment following specific guidelines to consider the impact that any changes in policy or procedure (or the creation of a new policy or procedure), will have on persons with protected equality characteristics. A timely assessment should be made before any decision is taken on any relevant change (i.e. that affects people with protected equality characteristics).

- **Socio-economic Duty.** Wales has implemented this further duty which is part of the Equality Act 2010 and places a duty to address socio-economic disadvantages in strategic decisions.
- **Welsh Language Standards (Section 44 Welsh Language Measure (Wales) 2011).** The Council is required to consider the impact that any change in policy or procedure (or the creation of a new policy or procedure), will have on opportunities for people to use the Welsh language and to ensure that the Welsh language is not treated less favourably than English. This document therefore ensures that these decisions safeguard and promote the use made of the Welsh language.
- **Well-being of Future Generations Act 2015.** The Council has a duty to put the five ways of working in place and to respond to the seven national well-being goals.
- **Armed Forces Act 2021.** Councils must give due attention to the impact of this proposal on those who serve or who have served in the Armed Forces, as well as their families.

Response Plan

Author: Eleri Jones (TA)

Job Title:

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STEP 1 - Main Aims and Objectives of the Policy or Practice

1. What kind of document or procedure is being assessed?

- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Local implementation of National Strategy/Plans/Legislation (refer to any national EqIA and consider local impact)

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

The Equality Impact Assessment assesses the strategic, operational and cultural impact of Cyngor Gwynedd's Response Plan to matters noted in the Our Bravery Brought Justice statutory report (November 2025).

The Response Plan seeks to:

- Acknowledge historical failures and provide a clear and transparent response.
- Support the victims and community of Ysgol Friars.
- Restore public trust in safeguarding arrangements.
- Strengthen multi-agency policy, training, governance and response.
- Ensure that children will never again experience the harm that occurred under organisational supervision.

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

- Women / Young girls
- Children with ALN
- Children who have experienced trauma
- New staff or staff in safeguarding roles

STEP 2 - Engagement Data and Impact Assessment

4. Has there been any attempt to comply with the duty to engage in accordance with what is described above and has enough information been gathered to move forward?

No

Details of the engagement. Note any consultation or engagement you have conducted or intend to conduct.

Action	Dates	Information
Care Scrutiny Committee	13 January 2026	
Governance and Audit Committee	15 January 2026	
Education and Economy Scrutiny Committee	19 January 2026	
Full Council (Extraordinary)	5 February 2026	

5. What information is available about the impact on each of the following characteristics and subjects?

	Evidence, Information and Relevant Data	Potential Positive and/or Negative Impact
Race	<ul style="list-style-type: none">• Pupils from ethnic minority backgrounds that may be less likely to report abuse because of language	<ul style="list-style-type: none">• Display information in clear, accessible language, and multi-lingually where appropriate.

	<p>barriers, lack of trust or experiences of organisational discrimination.</p>	<ul style="list-style-type: none"> • Engage with youth forums and parents from ethnic minorities when updating policies. • Training for staff on cultural awareness and identifying risks in different communities.
Disability	<ul style="list-style-type: none"> • Children with disabilities (physical, learning or neuro-diversity) more likely to be at risk of over-use of reasonable force or abuse • Experience of the context of de-traumatising being able to worsen symptoms (e.g. ADHD, ASD, Anxiety). • Staff with disabilities who could face barriers when completing training, reports or using digital processes. 	<ul style="list-style-type: none"> • Reasonable force policy being reviewed and reconciled nationally and locally. • Trauma-informed training for the staff of all schools • Provide optional reporting pathways - including digital, face-to-face and in accessible ways.
Gender	<ul style="list-style-type: none"> • The criminal case involved young girls, which means a disproportionate impact on women and young girls in the education system. • Risk that more examples of sexual abuse could be raised organisationally, considering the historical governance failings. 	<ul style="list-style-type: none"> • Specific training on sexual abuse, grooming, and the behaviour of adults in positions of trust who work with children. • Wider work with specialist organisations such as RASASC. • Ensure that there is an independent point of contact (outside school) for children to be able to raise concerns, with a male or female. • Review pupil reporting processes to ensure that there are no gender-related obstructions to raising concerns.

Age	<ul style="list-style-type: none"> • Substantial impact on children and young people who suffered abuse • Parents who have experienced secondary trauma • Looked after children, ALN learners, or pupils experiencing emotional challenges are more vulnerable to harm. 	<ul style="list-style-type: none"> • New 'Voice of the Child' strategy ensures access to social workers and involvement in decisions. • Substantial extension of therapeutic support, including trauma services and school counselling. This will remain open for the future. • Strengthen referral processes and access to external agencies.
Religion and Belief	<ul style="list-style-type: none"> • Religious beliefs may affect the tendency to report abuse (e.g. taboo, stigma). • Safeguarding frameworks may conflict with the family values / community values. 	<ul style="list-style-type: none"> • Ensure that safeguarding practices are sensitive to religious backgrounds. • Create confidential pathways that do not require parental support. • Consult with different forums, e.g. youth forum, in order to ensure inclusive representation, including consideration to religion and belief.
Sexual Orientation	<ul style="list-style-type: none"> • LGBTQ+ pupils more likely to face organisational abuse, and sometimes less likely to report. • Risk of discrimination from staff or fellow pupils in sensitive situations. 	<ul style="list-style-type: none"> • Voice of the child strategy to secure that the views of all children are heard, regardless of their identity. • Training on discrimination and equality a part of safeguarding packages. • Ensure safe ways of reporting where there is no risk.
Gender reassignment	<ul style="list-style-type: none"> • Many trans young people experience abuse or bullying and are maybe less likely to trust adults to share concerns. 	<ul style="list-style-type: none"> • Voice of the Child Policy - the policy ensures that every child has an opportunity to express their view directly and in a safe and respectful manner - this includes young trans people.

	<ul style="list-style-type: none"> • Stigma and previous experiences of discrimination can reduce the likelihood that trans individuals will use reporting pathways, particularly if they have previously faced organisational abuse. • Increased risk if staff are not trained - if safeguarding training does not include sensitivity to gender identity, staff can either misinterpret behaviour as "attention seeking" or failing to identify signs of abuse that are specific to trans people (including targeted abuse). 	<ul style="list-style-type: none"> • Alternative reporting pathways - direct access to external services and confidential methods of particular importance to young trans people who need safe pathways that do not rely on parents, specific teachers, or staff who are not LGBTQ+ friendly. • Trauma-informed council - Trauma-informed methods are particularly important to trans people, where previous experiences of discrimination or de-humanisation is common. Training will provide support to respond to this in a sensitive manner.
Marriage and Civil Partnership	<ul style="list-style-type: none"> • Specific impact on parents or staff in traumatic relationships or where there is dispute. • Concerns about child safety may cause tension in the home. 	<ul style="list-style-type: none"> • Referrals to family support services. • HR support to staff who are under pressure.
Pregnancy and Maternity	<ul style="list-style-type: none"> • School staff who are pregnant or on maternity leave are more open to concerns and crisis-related stress. • Pregnant pupils or young parents are more vulnerable to harm if there is a lack of trust in the school. 	<ul style="list-style-type: none"> • Well-being support at school and through HR. • Staff training on recording specific risks.
The Welsh Language	<ul style="list-style-type: none"> • Risk to children and young people by not sharing disclosures or concerns if they are unable to do so in the language they feel is safest. 	<ul style="list-style-type: none"> • Bilingual web pages and communication plans.

	<ul style="list-style-type: none"> • Risk that pupils, victims and staff have less access to support services (counselling, trauma, helplines) in Welsh, affecting accessibility and the quality of the experience. • Risk to services supplied by third parties (e.g. trauma and specialist support), failing to comply with Language Standards. 	<ul style="list-style-type: none"> • Welfare, safeguarding and education officers in Gwynedd, operating naturally through the medium of Welsh. • Voice of the Child Policy - a child's right to express views in the language they feel most comfortable. • Safeguarding quality assurance arrangements to check the availability of bilingual communication. • Ensure that training provision is available through the medium of Welsh.
Socio-economic Considerations	<p>Children from lower-income families or families at social disadvantage are more likely to:</p> <ul style="list-style-type: none"> • experience abuse or neglect without being heard, also • face barriers to using support services • rely more on school support as a main source of welfare. <p>Communities with higher levels of deprivation are more vulnerable to:</p> <ul style="list-style-type: none"> • lack of potential trust in authorities • challenges in accessing external services • less access to digital resources for reporting pathways. 	<ul style="list-style-type: none"> • Commitment to considering the voice of the child and ensuring that clear reporting pathways are in place can help the children who are most vulnerable to economic harm. • The extension of counselling and support services in schools supports families without the financial ability to obtain private services. • Mitigation measures can include monitoring school and social services data to identify patterns and gaps according to economic class.

Those Who Serve or Who Have Served in the Armed Forces, As Well As Their Families	<ul style="list-style-type: none"> • The absence of a parent in the armed forces may mean that disclosures go unnoticed or that risk behaviours are not noted early. • School moves may happen without transferring adequate safeguarding information. 	<ul style="list-style-type: none"> • Better reporting pathways and the emphasis on the voice of the child can ensure that children from military families do not fall through the net. • Multi-agency collaboration to help as families move across counties and regions.
Human Rights	<ul style="list-style-type: none"> • Lack of staff awareness or gaps in training can reduce the ability of children to identify their rights. • Failure to communicate in a clear and transparent way can undermine the rights of parents to adequate information. 	<ul style="list-style-type: none"> • The Response Plan reinforces the rights of children by focusing on the voice of the child, transparency and accountability. • Incorporate the principles of the Rights of the Child into mandatory training across the Council.
Other	<ul style="list-style-type: none"> • No other impact has been identified. 	<ul style="list-style-type: none"> • No other impact has been identified.

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

- No gaps have been identified at present.

7. When considering other key decisions that affect these groups, is there an increasing impact (cumulative impact)?

- No increasing impact has currently been identified.

8. What does the proposal include to demonstrate you have given due regard to the Public Sector Equality Duty (to promote equal opportunity; help to eliminate unlawful discrimination, harassment, or victimisation and foster good relations and wider community cohesion) as covered by the three aims of the General Duty in the Equality Act 2010?

- The proposal demonstrates due regard to the Public Sector Equity Duty by ensuring that the principles of equality, safety and children's rights are embedded in all aspects of the Response Plan. This includes promoting equal opportunities through training, accessible reporting pathways and voice of the child policy; removing discrimination by strengthening policies and responding to allegations quickly and consistently; fostering good relationships by working closely with parents, the school community and multi-agency partners, restoring trust and building a safe, open and transparent culture.

9. How does the proposal show that due regard has been given to the need to address inequality due to socio-economic disadvantage? (Note that this relates to closing the inequality gap, rather than just improving outcomes for everyone.)

- The proposal demonstrates due regard to address socio-economic inequality by ensuring that support, reporting pathways and safeguarding services are accessible, free and targeted specifically to the children and families who are most vulnerable to harm in order to close inequality gaps.

10. How does the proposal show implementation in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011), to ensure that the Welsh language is not treated less favourably than the English language, and to ensure opportunities for people to use the Welsh language? Also, how does the proposal operate in accordance with the requirements of the Council's Welsh Language Strategy to take advantage of every opportunity to

promote the Welsh language (beyond providing bilingual services) and increase opportunities to use and learn the language in the community?

- The proposal demonstrates compliance with the Welsh Language Standards by ensuring that the Welsh language is never treated less favourably than English, providing all communications, reporting pathways, training and safeguarding service bilingually and actively promotes and expands opportunities for children, families and staff to use, live and learn in Welsh in line with the Council's language policy and strategy.

11. How does this proposal meet the requirements of the Well-being of Future Generations Act by implementing the five ways of working, and respond to the seven national well-being goals, including creating a More Equal Wales?

- The proposal meets the requirements of the Well-being of Future Generations Act by implementing the five ways of working - i.e., taking preventative steps, long-term working, integrating services, collaborating with external agencies and meaningful engagement with children, parents and staff - making a direct contribution to the seven well-being goals, particularly creating a more equal, safe and resilient Wales, where every child is safeguarded and supported.

STEP 3 - Procurement and Partnerships

12. Will this policy or practice be carried out wholly or partly by contractors or in partnership with another organisation(s)?

- Not direct, but it is possible that some associated elements will derive from the Plan such as counselling, training and therapeutic support being provided in part via contractors.

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

13. When considering proportionality, does the policy or practice have a significantly positive or negative impact or create unequal outcomes?

Significant Positive Impact:

- Systematic strengthening of all safeguarding arrangements.
- Re-establish school culture on children's rights and being trauma-informed.
- Improve school governance and accountability arrangements.

Significant Negative Impact:

- No negative impact

14. Any intentional negative impact and why it is believed that there is justification for operating in this way should be explained (for example, on the grounds of improving equal opportunities or developing good relationships between those who share a protected characteristic and those who do not or due to objective justification or positive action)

No negative impact

15. Will any of the negative impacts identified count as unlawful discrimination albeit they are unavoidable (e.g. budget cuts)?

No

Note the reason for stating this and the justification for proceeding

N/a

16. What other measures or changes could be included to strengthen or change the policy/practice to demonstrate that due regard has been given to equal opportunity; help to eliminate unlawful discrimination, harassment, or victimisation; and foster good relations and wider community cohesion; as covered by the improvement aim of the General Duty in the Equality Act 2010?

A series of measures to measure the impact of the plan are in place and are regularly checked by the Response Board.

17. What measures or other changes could be included to strengthen or change the policy/practice to demonstrate that due regard has been given to the need to reduce inequalities of outcome as a result of socio-economic disadvantage?

N/a

18. What other measures or changes could be included to strengthen or change the policy/practice to demonstrate that due regard has been given to the need to increase opportunities for people 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 to reduce or prevent any adverse effects that the policy/practice may have on the **Welsh language?**

N/a

19. Is there enough information to make a balanced judgement and to proceed?

Yes

STEP 5 - Decision to Proceed

20. Given the information gathered in Steps 1–4 above, is it possible to move forward with the policy or practice or not, and if so, on what basis? Choice of:

Continue with policy or practice in its current form

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

The EqIA process is an ongoing one that doesn't end when the policy/practice and EqIA 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](#)

21. What actions noted in Steps 1-5 or any additional data collection work would help to monitor the policy/practice when implemented:

Action	Dates	Timetable	Lead Responsibility	Add to the Service Plan
Regular review of risks deriving from the Plan	Response Board	2 months	Dafydd Gibbard	Yes

22. What arrangements to monitor and review the ongoing impact of this policy or practice will be implemented, including timeframes for when it should be formally reviewed:

Monitoring and Review Arrangements (including where outcomes will be recorded)	Timeframe and Frequency	Lead Responsibility	Add to the Service Plan
Ongoing review as a part of the Response Board's arrangements	2 months	Sally Holland	No
Review of the Response Plan through the Scrutiny Forums	6 months	Dafydd Gibbard	No