

**CABINET: THURSDAY, 15 DECEMBER 2022 at 2.00 PM**

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A Cabinet Meeting will be held in CR 4, County Hall and as a Multi Location Meeting on 15 December 2022 at 2.00 pm

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**A G E N D A**

- 1 Minutes of the Cabinet meeting held on 17 November 2022 *(Pages 3 - 8)*

**Leader**

- 2 Race Equality Task Force- Response *(Pages 9 - 122)*

**Climate Change**

- 3 One Planet Cardiff Annual Review *(Pages 123 - 160)*

**Climate Change & Transport & Strategic Planning**

- 4 Local Air Quality Management *(Pages 161 - 346)*

**Culture, Parks & Events**

- 5 St David's Hall *(Pages 347 - 694)*

**Education**

- 6 School Organisation Proposals: Moorland Early Years Unit And Replacement Flying Start: Procurement Of Contractor For Construction *(Pages 695 - 864)*
- 7 Agreed Syllabus for Religion, Values and Ethics (Cardiff) and Terms of Reference *(Pages 865 - 920)*

**Housing & Communities**

- 8 Council Housing Rent & Service Charge Setting 2023/24 *(Pages 921 - 970)*

**Investment & Development**

- 9 Cardiff Bay Regeneration *(Pages 971 - 1092)*

**Finance, Modernisation & Performance**

- 10 Corporate Safeguarding Policy 2022-2025 (*Pages 1093 - 1160*)
- 11 Corporate Risk Management - Quarter Two 2022/23 (*Pages 1161 - 1192*)
- 12 Calculation of Council Tax Base 2023/24 (*Pages 1193 - 1212*)
- 13 Council Tax premiums (*Pages 1213 - 1218*)
- 14 Local broadband Fund - Improving Connectivity to Poorly Served Premises (*Pages 1219 - 1248*)

**PAUL ORDERS**

Chief Executive

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

**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



MINUTES

CABINET MEETING: 17 NOVEMBER 2022

Present: Councillor Huw Thomas (Leader)  
Councillors Peter Bradbury/ Julie Sangani (job share)  
Councillor Jen Burke-Davies  
Councillor Dan De'Ath  
Councillor Russell Goodway  
Councillors Norma Mackie/ Ash Lister (job share)  
Councillor Sarah Merry  
Councillor Lynda Thorne  
Councillor Chris Weaver  
Councillor Caro Wild

Observers: Councillor Joe Carter  
Councillor Adrian Robson  
Councillor Peter Wong (Minute no 48)

Officers: Paul Orders, Chief Executive  
Chris Lee, Section 151 Officer  
Leanne Weston, for Monitoring Officer  
Sarah McGill, Corporate Director  
Joanne Watkins, Cabinet Office

**47 MINUTES OF THE CABINET MEETING HELD ON 20 OCTOBER 2022**

**RESOLVED:** The minutes of the Cabinet meeting held on 20 October 2022 were approved

**48 TO RECEIVE THE REPORT OF THE ENVIRONMENTAL SCRUTINY COMMITTEE ENTITLED SUPPLEMENTARY PLANNING GUIDANCE**

Attending on behalf of the Environmental Scrutiny Committee, Councillor Peter Wong, presented the Environmental Scrutiny Committee report entitled 'Supplementary Planning Guidance'. He outlined the nature of the inquiry, including the evidence and witnesses used and detailed the findings and recommendations.

**RESOLVED:** that the report be received and responded to within the usual timescales

## 49 SHARED PROSPERITY FUND - UPDATE

***Councillor Caro Wild declared a personal interest in this item as his partner worked for one of the projects listed. He advised that he would take no part in the discussion.***

Cabinet considered a report which provided an update on the Shared Prosperity fund and included details of the approach to managing and delivering the fund in Cardiff. It was reported that confirmation of funding was still awaited however it was important an initial position was adopted given that funding was annual and that further reports would be brought to Cabinet at the appropriate time.

**RESOLVED:** that

- a) the update on the development of Shared Prosperity Fund proposals be noted
- b) Subject to recommendation (c) approval be given to the draft Shared Prosperity Fund Programme and associated Governance arrangements.
- c) Authority be delegated to the Chief Executive in consultation with the Leader of the Council to make amendments to the Shared Prosperity Fund Programme following consultation with the partners set out in paragraph 29 to this report.
- d) Subject to recommendation (e) approval be given to the Year One Delivery Plan.
- e) Authority be delegated to the Chief Executive in consultation with the Leader of the Council to vary the Year One Delivery Plan when appropriate to do so in line with paragraphs 35 to 38 to this report.

## 50 FAIRWATER CAMPUS BAND B REDEVELOPMENT

**Appendix 2 to this report is exempt from publication on the basis that it contains information of the description set out in paragraphs 14 and 21 of Part 4 of schedule 12 A of the Local Government Act 1972 and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information and is exempt from disclosure as it contains information pursuant to paragraph 16 of the Local Government Act 1972**

***Councillor Peter Bradbury declared a personal interest in this item as a governor at the Western Learning Campus.***

The Cabinet received an report outlining a request to authorise funds from the Sustainable Communities of Learning Band B programme to enable commencement of work to progress Fairwater Community Campus. It was reported that this was subject to Ministerial approval of the Final Business

Case. The proposed Fairwater Community Campus would provide 21<sup>st</sup> Century educational facilities in new build schools on the existing site of Cantonian High School. It was reported that there had been a number of budgetary pressures resulting in cost increase since the design stage, mainly due to inflation increases and design development.

**RESOLVED:** that

- (i) Authorisation be given to the total funds required as this stage from the Council's Sustainable Communities for Learning Band B Programme, subject to Ministerial approval of the Final Business Case, to enable commencement of the enabling works required to progress the Fairwater Community Campus.
- (ii) the commitment required for the early works orders to progress the project at risk ahead of entering into contract be noted

## 51 **TREASURY MANAGEMENT MID YEAR REPORT**

***Annexes B & C to Appendix 1 to this report are not for publication as they contain exempt information of the description in Paragraphs 14 and 21 of Schedule 12A of the Local Government Act 1972.***

The Treasury Management report was considered by Cabinet. The report provided an update on the Council's Treasury Management activity since 1 April 2022 and provided details of the Council's borrowing and investments. It was reported that no policy changes or changes to limits were required at this stage.

**RESOLVED:** that the Treasury Management Mid-Year Report 2022-23 be noted, prior to its submission to Full Council in November 2022 (Appendix 1).

## 52 **NON DOMESTIC RATES - WRITES OFFS**

***Appendices A and B to this report are exempt from publication by virtue of paragraph 14 of Part 4 and paragraph 21 of Part 5 of Schedule 12A of the Local Government Act 1972***

The Cabinet considered a report seeking authorisation to write off Non-Domestic Rate debts which exceed £100,000 in value. It was reported that Business rates were collected on behalf of the Welsh Government with the cost of all write offs borne by the pool, and not directly by the Council.

**RESOLVED:** that authorisation be given to write off the debts set out in **Appendix A**, amounting to £1,282,187.71

## 53 BUDGET MONITORING MONTH 6

Details of the projected 2022/23 financial monitoring position as at the end of September 2022 (Month 6) against the 2022/23 budget were received. It was reported that the overall monitoring position, as at Month 6, reflected a total projected net annual Council overspend of £7.394 million, this took into account the impact of the pay award of £4.961 million which had been agreed since the last considered monitoring position at month 4. Given the impact of the pay award, the corrective action and additional savings identified by directorates had already had an impact on the budget position.

**RESOLVED:** that

1. the projected revenue financial outturn based on the projected position at Month 6 2022/23 be noted
2. the capital spend and projected position at Month 6 2022/23 be noted

## 54 A NEW HOUSING PARTNERSHIP

***Appendix B to this report is not for publication as it contains exempt information of the description contained in paragraph 14 and 16 of Part 4 and paragraph 21 of Part 5 of Schedule 12A to the Local Government Act 1972***

The Cabinet received a report outlining proposals for a second Cardiff Housing Partnership. It was reported that the first programme, Cardiff Living, had delivered a significant high quality, energy efficient homes across the city to help increase the supply of affordable housing and the partnership approach had demonstrated a better use of resources, certainty of delivery and a consistency of quality. The report detailed the options available to the Council in developing a second partnership and included options for collaboration with other Local Authorities.

**RESOLVED:** that

1. approval in principle be given to the implementation of a second Cardiff Housing Partnership Programme including the commencement of a procurement exercise to appoint a development partner.
2. Approval be given to the list of development sites currently proposed to be included within a second partnership programme and approval that more suitable sites can be added into the programme, subject to complying with financial parameters including viability assessments and working within the HRA Business plan.
3. authority be delegated to the Corporate Director for People and Communities in consultation with the Cabinet member for Housing and Communities, to manage all matters relating to the procurement process including agreeing the procurement route, agreeing the

parameters and delivery model of a second partnership programme, agreeing the procurement documents, agreeing the evaluation criteria and the evaluation of the bids.

4. It be noted that a subsequent report will be presented to Cabinet following the conclusion of the procurement process seeking approval to appoint the preferred Bidder.

## 55 **SHARED REGULATORY SERVICES ANNUAL REPORT 2021-22**

The Shared Regulatory Services Annual Report for 2021-22 was received. It outlined the performance of the SRS for 2021-22, highlighting in particular the work of the service during the COVID19 pandemic. The Cabinet Member expressed his thanks to SRS staff for their work during this time.

**RESOLVED:** that the Shared Regulatory Services Annual Report for 2021-22 be noted

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**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**CABINET MEETING: 15 DECEMBER 2022**

**CARDIFF RACE EQUALITY TASKFORCE: RESPONSE**

**LEADER (COUNCILLOR HUW THOMAS)**

**AGENDA ITEM: 2**

**Reason for this Report**

1. To inform Cabinet of the work undertaken to date by the Council following the publication of the Cardiff Race Equality Taskforce report in March 2022.
2. To agree the Council's response (Appendix 1) to the Race Equality Taskforce recommendations, which aim to advance race equality and challenge racial injustice in Cardiff.

**Background**

3. In July 2020, in response to the Black Lives Matter movement, Cabinet agreed to establish a Race Equality Taskforce to work with the Council and public sector partners to identify practical opportunities for change that would improve race equality in Cardiff and find new ways to improve outcomes for Ethnic Minority residents.
4. The Taskforce published its final report in March 2022 (Appendix 2). The report was informed by extensive engagement with local Ethnic Minority communities, public service partners, and the city's major employers and drew on a comprehensive body of data and evidence to inform its recommendations.
5. The Stronger, Fairer, Greener policy statement agreed by Cabinet in July 2022 committed the Council to *'respond to and implement in full the recommendations of the Race Equality Taskforce.'* This report sets out the progress made since the Report was published and outlines the Council's response to each Taskforce recommendation.

**Issues**

Diversity and Inequality in Cardiff

6. Cardiff is a diverse city, with Ethnic Minority groups accounting for a greater percentage of the population than anywhere else in Wales. The Census 2021

tells us that 21.2% of the total population of Cardiff's residents were from Ethnic Minority groups. In comparison, 6.2% of the total population in Wales are from Ethnic Minority Groups. Data from the Pupil Level Annual School Census for 2021/22 estimates that 9,231 pupils aged 5 or over are from Minority Ethnic groups: which is 36.8% of the total school population, compared with 13.3% for Wales as a whole.

7. Available data sources make clear that the lived experience and life-chances for Ethnic Minority people in Cardiff differs significantly from those of White people. The Welsh Index of Multiple Deprivation paints a complex picture for the city, however, in terms of overall deprivation, 34.8% of Cardiff's Black/African/Caribbean/Black British population reside in the 10% most deprived group. This is double the number of Cardiff's White population who reside in the same group, at 17.2%.
8. Cabinet recognises the divergent experiences of different Ethnic Minority groups and the necessity of a nuanced approach if we are to progress race equality.

#### Responding to the Black Lives Matter Movement and Establishing the Race Equality Taskforce

9. The tragic death of George Floyd in the USA saw protests taking place across the world, including in Cardiff, as part of the Black Lives Matter movement. This led to a reflection on how the history of Black communities in the UK are treated and on the ongoing challenges that Ethnic Minority people continue to face in today's society.
10. Cabinet therefore agreed to establish a Race Equality Taskforce to identify meaningful and evidence-led actions and recommendations to address racial discrimination and promote race equality in Cardiff. In July 2020, Cabinet agreed that the Race Equality Taskforce would:
  - Work with Cardiff's communities and organisations to improve and prioritise race equality to achieve an inclusive, cohesive, thriving and representative city;
  - Guide Cardiff's policy and strategy developers to make sure race equality is included in all of their work;
  - Use the Council's convening power to advance race equality in the public, private and voluntary sector, working closely, where required, with the Cardiff Public Services Board;
  - Coordinate actions and recommendations to advance race equality, focusing on priority work-streams, identified in consultation with the City's Ethnic Minority residents;
  - Report on progress on race equality and the general impact of inequality and discrimination on the Ethnic Minority communities of Cardiff.

11. In preparation for the work of the Race Equality Taskforce, a public consultation was launched to seek the views of Cardiff residents, particularly those from Black and Minority Ethnic backgrounds, on the Taskforce's strategic priorities. The Council wanted to understand what residents considered to be the biggest issues, and the greatest opportunities, for Black and Minority Ethnic residents. A bilingual, online survey was developed, and promoted on the Council's social media channels, through partner organisations, and sent to the Council's Citizen's Panel. It was live between 11<sup>th</sup> August and 10<sup>th</sup> October 2020. After data cleansing and validation, to remove blank and duplicated responses, a total of 869 responses were included in the analysis. The results of the survey are included as an Appendix to the Final Report of the Taskforce.

#### Taskforce Composition: Chair and Membership

12. The Leader of the Council invited the Ward Councillor for Butetown, Cllr Saeed Ebrahim, to Chair the Race Equality Taskforce. The Chair oversaw the activities of the work-streams and strategic activities associated with tackling discrimination and disadvantage faced by Ethnic Minority people in Cardiff, along with chairing Taskforce meetings, and promoting the work of the Taskforce.
13. The Taskforce included the Chair and 14 members. The membership was made up of individuals with insight and interest in race, ethnicity, and human rights and with the ability, experience, opportunity and influence to make changes in their sector, industry and institutions or organisations. Membership of the Taskforce was selected following a public appointment process that was openly advertised by the Council. The terms of reference of the Taskforce are included as Appendix 3.

#### Taskforce Priorities for Action and work programme

14. The inaugural convening of the Race Equality Taskforce took place on 1st December 2020 and the appointed Chair and membership confirmed their priority areas of work. The selection of these priorities was informed by comprehensive analysis of the available ethnic inequality data and the views of city residents, as captured by the Taskforce's consultation. The Taskforce confirmed the following three priority themes to be led and developed by Cardiff Council. Whilst Cardiff Council hold an important convening role across these themes of work, the Taskforce recognised that they also required broad partnership focus that reached beyond the Council itself and into other parts of the public, private and voluntary sector. As such, the sub-groups developing the work programme were multi-agency and benefited from broader expertise from the city and beyond:
  - A) Employment and Representative Workforce:
  - B) Education and Young People
  - C) Citizen's Voice

15. Responding to residents' views within the consultation that further areas of Taskforce focus should include Health and Criminal Justice, the Taskforce sought further collaboration with the Cardiff & Vale University Health Board, South Wales Police and Cardiff Community Safety Partnership to create and progress a programme of work against these two additional themes. These public sector bodies and partnerships offered their support to the objectives of the Taskforce Programme and two further thematic sub-groups were created:

- D) Health
- E) Criminal Justice

### **Recommendations of the Cardiff Race Equality Taskforce**

16. The Final Report of the Taskforce, received by Cabinet in March 2022, made 28 recommendations across the 5 thematic areas. The recommendations of the Taskforce were considered by the Policy Review and Performance (PRAP) Scrutiny Committee on 8 March 2022. The Committee supported the recommendations of the Taskforce and made further suggestions for improvement, which were endorsed by the Chair of the Taskforce. The recommendations of PRAP scrutiny committee are attached as (Appendix 4a), all of which were either accepted or partially accepted by the Cabinet (Appendix 4b).

### **Responding to the Recommendations of the Cardiff Race Equality Taskforce**

17. Delivering the recommendations of Cardiff's Race Equality Taskforce will require long-term, sustained action. There have already been significant milestones achieved in implementing the recommendations of the Taskforce over the course of the 18-month programme. An interim update report setting out progress to date was published when Cabinet received the Race Equality Taskforce's Report in March 2022.
18. Following the publication of the Taskforce's Report in March 2022, the Council undertook a programme of work to identify actions that would respond, in full, to each of the recommendations. This involved an assessment of achievability and identifying appropriate delivery arrangements.
19. The Council's proposed response to each of Taskforce recommendations is out in Appendix 4 and includes the following details:
- Recommendation: *The Taskforce Recommendations*
  - Status: *Whether the Recommendation is Accepted, Partially Accepted, Not Accepted*
  - Commitment/s: *Details of the actions the Council will progress*
  - Lead Officer: *A named Lead Officer with responsibility for delivery*
  - Key Milestones: *Timelines for delivery*
20. Each recommendation relating directly to the Cabinet has been accepted in full and is supported by clear implementation arrangements. The recommendations which require a wider partnership response have been

identified and were considered by the Cardiff Public Services Board on 30 November 2022.

### **Governance and Monitoring Procedures**

21. As set out in paragraph 20, in response to each recommendation a proposed action has been identified, along with delivery milestones, performance measures where appropriate and a responsible lead officer. These actions, milestones, and performance measures will be embedded within either the Council's Corporate Plan or Directorate Delivery Plans, as considered most appropriate. Any Race Equality Taskforce's recommendations agreed by Cabinet will therefore be incorporated into the Council's policy framework to ensure accountability for their delivery. It is also proposed that the Council's self-assessment process, a core part of its new Planning and Performance Framework, be enhanced to include a focus on Equality, Diversity, and Inclusion.
22. Progress against commitments in the Criminal Justice thematic area will be reported to the city's Community Safety Leadership Board, and to the Cardiff Public Services Board. Progress against commitments in the Health thematic area will be reported to the Cardiff and Vale University Health Board Executive. Overall oversight of the 5 thematic areas will be undertaken by the Cardiff Public Services Board, with scrutiny provided by Policy Review and Performance Committee.
23. In addition, the Leader of the Council has invited the Chair to reconvene the Taskforce in 2023 to provide an assessment of progress against the recommendations.

### **Scrutiny Consideration**

24. The Policy review & performance Scrutiny committee is due to consider this item. Any comments received will be reported at the Cabinet meeting.

### **Reason for Recommendations**

25. To allow Cabinet to agree its response to the recommendations of the Cardiff Race Equality Taskforce and embed agreed actions in the Planning and Delivery Framework.

### **Financial Implications**

26. By embedding the recommendations into the council's activities, any financial implications of actions highlighted in the report are assumed to be included and managed within the existing budget framework.

### **Legal Implications**

27. There are no legal implications arising from this report.

## **HR Implications**

28. The Trade Unions within Cardiff Council have been consulted on the recommendations of the Race Equality Taskforce and the commitments made by the Council. There are a number of actions which will provide support for staff employed by the Council and broaden staff's awareness and education in the areas covered by the taskforce

## **Property Implications**

29. There are no property implications arising from this report.

## **RECOMMENDATIONS**

Cabinet is recommended to agree the Council's response to the recommendations of the Race Equality Taskforce as set out in Appendix 1

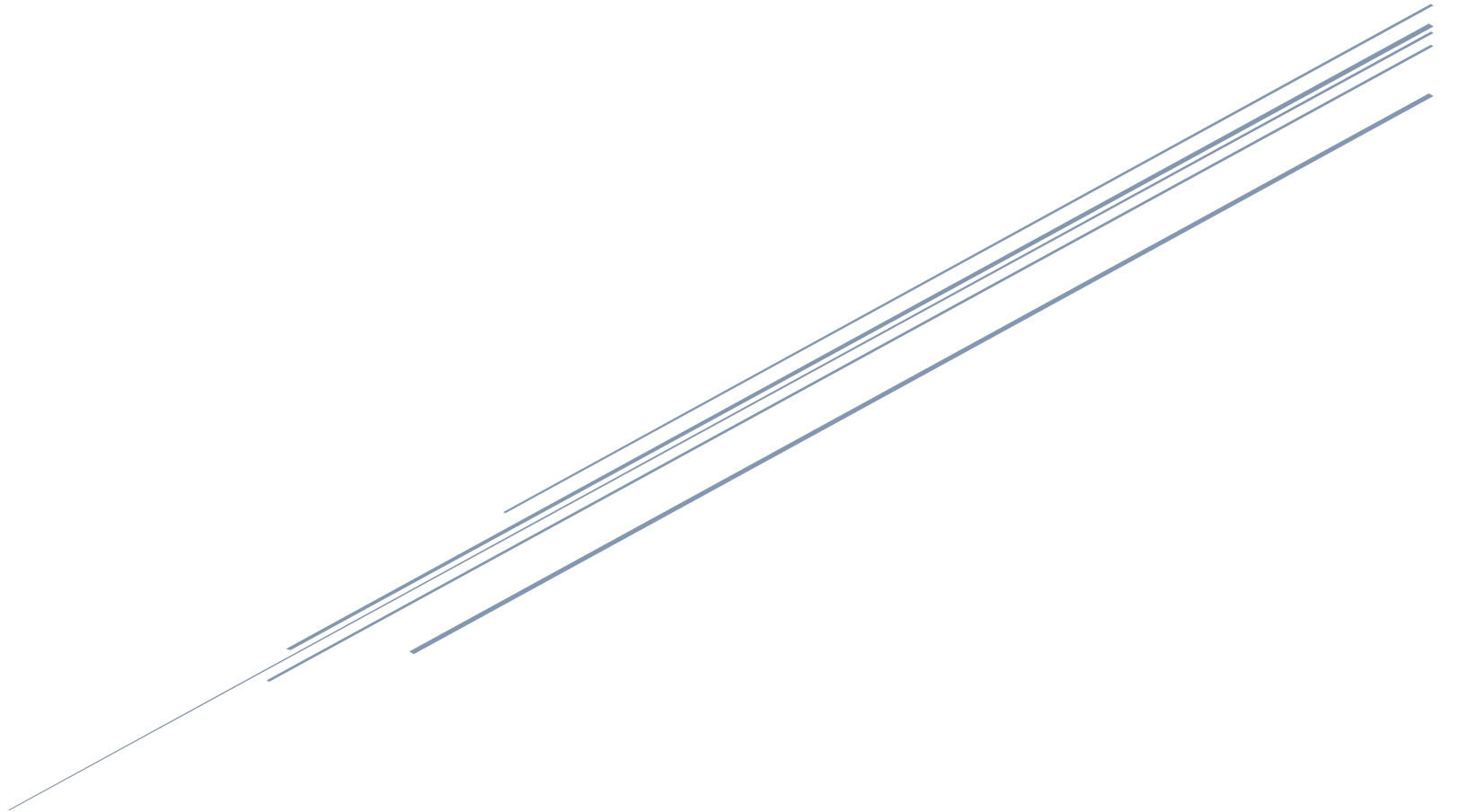
<b>SENIOR RESPONSIBLE OFFICER</b>	<b>SARAH MCGILL</b> <b>Corporate Director People &amp; Communities</b>
	9 December 2022

*The following appendices are attached:*

- Appendix 1: Council Response to the Race Equality Taskforce Recommendations.
- Appendix 2: Final Report of the Race Equality Taskforce
- Appendix 3: Race Equality Taskforce Terms of Reference
- Appendix 4a: Policy Review and Performance Scrutiny Committee Letter and Recommendations
- Appendix 4b: Cabinet Response to the Policy Review and Performance Scrutiny Committee Letter and Recommendations.

# CARDIFF RACE EQUALITY TASKFORCE

Response: Cardiff Council & Public Service Partners



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## Employment and Representative Workforce


Reference	Recommendation	Lead Officer	Timeline
 <p>1.1</p>	<p>Develop a city-wide network for employers to encourage good practice and collaboration on employment action to improve ethnic minority representation and progression in the local labour market</p>	<p>Dylan Owen</p>	<p>Q4 2022/23</p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date and Next Steps:</b></p> <p>Following approval of this proposal at the Race Equality Taskforce, the Council's Equality Team established a partnership working group to begin designing ideas for a city partnership forum focused on the achievement of shared equality priorities across the public, private, voluntary and university sectors.</p> <p>A proposal for a future city-wide equality forum was agreed by the Public Services Board on 30 November. Equality leads within public services in Cardiff will meet to share knowledge, guidance, best practice and streamline equality strategies and objectives for the city.</p> <p>The future collaborative forum will meet for the first time in Q4 of 2022/23.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ We will establish a new Cardiff Equality Network for Public Services Board organisations working closely with other sectors by Q4 2022/23.</li> </ul>			

Reference	Recommendation	Lead Officer	Timeline
 <p>1.2</p>	<p><b>Become a signatory to the Cardiff Community Jobs Compact</b></p>	<p><b>Tracey Thomas</b></p>	<p><b>Complete</b></p>
<p><b>Response: Recommendation Accepted and Completed.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>Cardiff Council became a signatory to the Cardiff Community Jobs Compact on 7<sup>th</sup> March 2022. The Council publicly endorsed the Compact during the signing and encouraged other employers in the city to become a signatory. Cardiff Council's application highlighted areas of good employment practice adopted by the Council which reflect the standards required by the Compact.</p> <p>In accepting the Council's application, the Community Job Compact's assessment panel concluded that the Council has successfully satisfied the requirements listed in the Compact, which are:</p> <ul style="list-style-type: none"> <li>• Be accredited as a 'Real Living Wage for Wales' employer;</li> <li>• Paying all staff and contractors at least £9.90 an hour (the Real Living Wage rate from 1<sup>st</sup> April 2022);</li> <li>• Recruit using name-blind and address-blind CVs and/or guarantee an interview to local residents who meet the criteria;</li> <li>• Introduce unconscious bias training for interviewers;</li> <li>• Ensure all staff have the option of a minimum hour's contract and;</li> <li>• Demonstrate opportunities for growth and development.</li> </ul> <p><b>Commitment:</b></p> <p>➤ We will monitor and ensure compact commitments are delivered.</p>			

Reference	Recommendation	Lead Officer	Timeline
 <p>1.3</p>	<p><b>Use planning and commissioning powers to require employers to recruit apprenticeships from disadvantaged groups and to increase transparency about the diversity of their workforces</b></p>	<p><b>Hayley Beynon</b></p> <p><b>John Paxton</b></p>	<p><b>Autumn 2022</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>The Council has recently agreed a new Socially Responsible Procurement Policy including ensuring maximum social value is delivered through the Council’s contracts. The Council is also increasingly using Social Value TOMs (Themes, Outcomes, Measures) and the Social Value Portal to maximise the delivery of social value through its contracts. As this roll out of the Social Value TOMs continues a strong focus remains on maximising the number of jobs, apprenticeships, work placements delivered through Council contracts. The Council’s Into Work Team and Cardiff Commitment Team are working closely with this programme.</p> <p>To increase transparency about the diversity of their workforce in 2022 we started asking all contractors delivering social value to report on the ‘Percentage of employees (FTE) from Ethnic Minority Groups hired on the contract.’ The reporting information will start becoming available later in 2022.</p> <p>In 2021/22 there were 11 projects registered on the Social Value Portal that had the following social value commitments made:</p> <ul style="list-style-type: none"> <li>• Over 4,500 Apprenticeships (weeks)</li> <li>• Over 5,700 hours of Career Support Sessions</li> <li>• £2,000 Charity Support to the Voluntary, Community and Social Enterprises</li> <li>• Over £2,146,029 to support Community Support initiatives</li> <li>• 1 Ex-Offenders to be employed</li> <li>• 5 Disadvantaged People (no) to be employed</li> <li>• 41 Long Term Unemployed people to be employed</li> <li>• 5 NEETS to be employed</li> </ul>			

<ul style="list-style-type: none"> <li>• 1,194 hours of Educational Sessions in school/college visits</li> <li>• 472 Expert Hours support to SMEs/Third Sector</li> <li>• Almost 2,000 hours of equality, diversity and inclusion training across 10 contracts</li> <li>• Over 1,500 weeks of Training Opportunities</li> <li>• Over £300,000 spend with Voluntary, Community and Social Enterprises within supply chains</li> <li>• Over 3,300 Volunteer Hours provided to local community projects</li> <li>• Over 575 tonnes of hard to recycle waste diverted from landfill / incineration</li> <li>• Over 2400 Car Miles Saved as a result of green transport</li> <li>• Over 200 employees provided with wellbeing programmes.</li> </ul> <p>The Cardiff Arena and Atlantic Wharf Development was the first Cardiff Council project which included the Social Value TOMs framework following the successful pilot and is anticipated to deliver the following benefits with a specific focus and commitment to ensure they reach our most socioeconomically deprived parts of the city:</p> <p><b>Case Study: Former Fitzalan High School pupil appointed for new build school</b></p> <p>Radika is an ex-Fitzalan pupil and is a graduate design manager on the development, led by Keir. Reports from the contractor state she is a fantastic addition to the team and has been involved with meeting the education minister and been a guest speaker at a women in construction event at CAVC. Please see a link to press release regarding the school <a href="#">Latest pictures of new Fitzalan High School as building gets well underway - Wales Online</a></p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Deliver the Council’s Socially Responsible Procurement Policy including ensuring maximum social value is delivered through the Council’s contracts. This will include ensuring that the Social Value TOMs are included in all contracts over £250,000 and monitoring the Social Value Portal and tendered contracts to ensure commitments are being met.</li> <li>➤ Strongly encourage contractors to utilise the Into Work and Cardiff Commitment provision when seeking new staff, in order to support an increase in diversity of their contracted workforces by employing from underrepresented and disadvantaged groups.</li> </ul>		
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Reference	Recommendation	Lead Officer	Timeline
 <p>1.4</p>	<p><b>Support an inclusive and engaged workforce where all staff understand and contribute to race equality action through awareness raising internal programming</b></p>	<p><b>Tracey Thomas</b></p>	<p><b>Jan 2023 then rolling</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>As part of the Black and Asian Minority Ethnic Staff Network’s action plan for 2021, a successful trial of unconscious bias training and cultural awareness training was delivered in 2021 for Network members.</p> <p>Following the Network’s reflections on the value of the unconscious bias training in raising awareness of contemporary race equality issues and the experiences of Black, Asian, and Ethnic Minority staff in the workplace and as service users, this training programme will be upscaled and delivered to all Council staff. More broadly, the Council will refresh its Equalities Training and roll it out to all staff.</p> <p>The Council will review and refresh the Council’s wider Equality, Diversity, and Inclusion training. The majority of staff will be able to complete modules via e-learning. Bespoke training will be put in place for front line staff and for those staff who do not have access to a PC.</p> <p>In addition to this programme of training, the Council’s Human Resources team, Equality Team, and the Black and Asian Minority Ethnic Staff Network are working together to develop a programme of Lunch and Learn events, inviting staff from across the Council to engage with the Network and benefit from the knowledge, experience, and insight of Network members in supporting inclusive service practice. This will also include new digital materials and content to extend the learning offer to all Council staff, irrespective of their role or place of work. The Lunch and Learn Sessions will be put in place in 2022/23, with support from the Equalities Team and Organisational Development Team, focussing on issues that are important to network members.</p> <p>The Council is also committed to improving the collection of workforce data.</p>		<p><b>Black and Asian Minority Ethnic Staff Network Chair</b></p>	

<p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Roll out unconscious bias and microaggression training.</li> <li>➤ Review and refresh the Council’s wider Equality, Diversity and Inclusion training and consider which components should be mandatory for all staff.</li> <li>➤ Commission/develop bespoke training on equality and diversity for front line staff.</li> <li>➤ Provide mandatory training in community languages, where appropriate.</li> <li>➤ Support the Black, Asian, Minority Ethnic Staff Networks to Develop a Programme of Cultural Awareness Resources, Training and Engagement Opportunities for all staff.</li> <li>➤ Put in place an enhanced programme to encourage staff to provide ethnicity (and other equalities) data, to allow the Council to better understand the diversity of its workforce.</li> </ul>			
<p>Reference</p>	<p>Recommendation</p>	<p>Lead Officer</p>	<p>Timeline</p>
<p>1.5</p> 	<p><b>Increase participation of ethnic minority groups in the Into Work Advice Service</b></p>	<p><b>Hayley Beynon</b></p>	<p><b>January to April 2023 – Engagement plan to be updated on the success of this year’s events.</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>Following the progression of this recommendation by the Race Equality Taskforce, the Into Work service delivered a significant programme of outreach and engagement events specifically targeting Cardiff’s ethnic minority communities.</p>			

The service has also developed new training resources to respond to the specific employability support needs of some ethnic minority job seekers which the service supports, such as recent arrivals to the UK who need support to prepare for entry to the UK labour market.

This programme of activity has included:

- Planning and delivering sector specific training packages for ethnic minority jobseekers, such as 'Get Into Construction'. This includes onsite training, an opportunity to gain sector specific qualifications and work experience.
- Recruiting and appointing Community Champions to disseminate information, promote events and opportunities to ethnic minority jobseekers, using the Prince's Trust 'Community Ambassador' model.
- Planning and delivering a comprehensive publicity campaign to promote training, volunteering, work placements and employment opportunities for ethnic minority jobseekers. Targeting young people through Instagram, Twitter, and Facebook.

**Highlight of events and engagement delivered to date:**

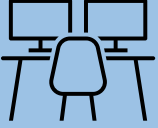
- On 30th June 2021, in partnership with Princes Trust, Grangetown Hub and Into Work ran a 'Google Certification Q&A' event, where 20 jobseekers from Butetown Riverside and Grangetown attended virtually. The 20 individuals were supported and have been signed up to specific Into Work employability mentoring schemes to help them find work.
- Two engagement events were successfully undertaken. One on the 14th of July at Grangetown Hub, which included stalls for: volunteering, Digital skills, NHS opportunities briefing, mentoring projects, refreshments, and chance to win a laptop. The second event took place in September at Butetown Pavilion, and included activities for all ages, a range of stalls (as above), and employers.
- In partnership with the CITB Construction Hub, Into Work have been regularly delivering a 5-day 'Get Into Construction' course. The course is delivered at Butetown Pavilion. The course includes working at heights, asbestos awareness, street signalling, CSCS Card, Health and safety level 2 and a work experience placement. The Into Work service then provide follow-up support to help participants to find long-term sustainable employment.
- The *Communities for Work* project delivered a publicity campaign during July, August and September 2021 including; distribution of posters, a social media campaign shared across Cardiff Council/Into Work social media platforms, advertisements on Cardiff Bus and Nat Group buses, digital boards and bus stop posters with a Text 2 Speech service link.

- In November 2021 Into Work delivered a Kickstart Admin Jobs event in Butetown Pavilion. 5 young people attended, and with support from the Into Work team, 1 young person secured employment with the NHS following this event. In addition, in partnership with Boss and Brew, a Barista Course was provided to 6 young people attended and they have since been assisted with securing Work placements.
- Into Work delivered Kickstart application support events over 5 days, from 29th November- Friday 3<sup>rd</sup> December supporting young people to secure the opportunity of a paid six-month apprenticeship, including apprentice roles across all sectors.
- Volunteer Community Champions roles have been advertised in collaboration with the Wellbeing District Hub Manager and the Into Work Volunteering team in Jan 2022.
- Into Work delivered a second round of Kickstart application support sessions in venues across the Southern Arc of the city, the areas with the highest levels of socioeconomic disadvantage.
- Into Work delivered range of engagement events to be delivered across the city to coincide with 'Careers Week' (7th - 13th March).
- The Volunteer Community Champions roles has been launched by the Into Work Volunteering team and champions are now in post.
- An NHS Careers Road show event was hosted at Grangetown Hub on the 10<sup>th</sup> of March 2022.
- A Cleaning and Catering application support event at Grangetown Hub on the 5<sup>th</sup> July 2022.
- A Butetown Careers Fair was held on the 16<sup>th</sup> of July, where over 200 attended. Multiple employers were in attendance, community organisations, Into Work teams and a range of professionals on the day providing advice and guidance on their sectors.
- An Emergency Services Event at Grangetown Pavilion on the 3rd August.

**Commitment:**

- Continue to deliver regular targeted engagement events and monitor progression of participation.



<ul style="list-style-type: none"> <li>➤ Gather data of participation within services delivered by Into Work ensuring it is regularly monitored.</li> <li>➤ Explore with PSB members how the Council's Into Work Service (and Cardiff Works) can support recruitment activity in Ethnic Minority communities.</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
 <b>1.6</b>	<b>Improve access to and visibility of Cardiff Works for ethnic minority groups</b>	<b>Hayley Beynon</b>	<b>April 2023</b>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>To advance this proposal Cardiff Works delivered a social media campaign to raise awareness of the service on social platforms, targeting these at relevant neighbourhoods in the city.</p> <p>In addition to their online outreach, the team have community-based engagement, including attending schools with a high percentage of children from an ethnic minority background to engage families and the wider school community. Cardiff Works has also joined the IntoWork team at local job fairs.</p> <p>To widen access and visibility of the service, some additional changes have been made to internal policy within the service, including:</p> <ul style="list-style-type: none"> <li>• Ensuring that all non-admin &amp; clerical opportunities are posted externally on our website for greater reach with Job Description / Person Specification attached.</li> <li>• Improving accessibility Cardiff Works by introducing online assessments and online application forms.</li> <li>• Cardiff Works now provides a face-to-face service from Central Library Hub for those who need in-person assistance and to link in with job clubs and the IntoWork team.</li> </ul>			

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- Cardiff Works have begun to digitise the candidate matching process to ensure the best results for each placement linking in with the Into Work Employer Liaison Team.
- A new referral pathway has been established from the IntoWork service into Cardiff Works, which includes support from the pathway teams as well as direct support and projects. This referral mechanism enables greater collaboration between Cardiff Works and IntoWork and a pilot for this approach was delivered for Track & Trace Recruitment, which resulted in the recruitment of 195 staff.
- A Community Engagement Officer was appointed Sept 2022. The new officer will draw up an engagement plan to include community events and working with community organisations, schools, local businesses and religious groups.


Cardiff Works have also widened the scope of roles offered by the service, as well as the depth of training provided for roles. Completed actions to date include the following:

- Cardiff Works has significantly expanded the type of roles recruited for – these include placements such as Home Carers, Cleaners, Drivers, Forklift Operators, and Warehouse Operatives and Support Workers.
- Working alongside Adult Learning, Cardiff Works now provides comprehensive and specific training courses for our key vacancy areas, i.e. Get Into Care, and Get Into Cleaning. These provide candidates with the essential skills to secure recruitment offers. So far 79 clients have completed 'Get Into Cleaning' and 86 have completed 'Get Into Care'.

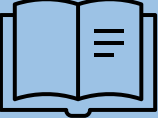
In addition, the service has expanded its staffing capacity to support further targeted outreach across Cardiff's Southern Arc, with priority focus on groups currently underrepresented in the city's workforce, which includes ethnic minority groups. Two Senior Advice Officers have been appointed to deliver this work in the Southern Arc of the city and commenced their roles in November 2021.

Cardiff Works has also developed a new alternative pathway into the service, which involves an accredited course run by Adult Learning. This is intended to bridge skills gaps which prevent candidates from securing employment through the service, where their needs have not been adequately met by existing support programmes. This course will focus on essential skills and be 20 hours a week of learning and support. Once a candidate has completed the course, they will be successfully registered with Cardiff Works and ready to be matched with opportunities. If a candidate has no previous work experience, Cardiff Works will support them to secure volunteering roles or a paid work placement to build relevant understanding of the workplace and how to transfer these skills into a paid role. So far, this new accredited course has been successfully delivered in four training cycles to date.

**CardiffWorks Ready:**

<p>A new employment project launched, with the aim of providing one to one mentoring for candidates who have either failed the Cardiff Works skills assessment or have barriers to sitting the assessment. Staff will work with these candidates in a personal and focused way to support their preparation to register for relevant skills development courses and secure a volunteering opportunity. The service will also partly subsidise a placement if the candidate does not yet have the relevant experience to secure a role.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Continue to widen access and visibility of service, monitoring the impact of changes made to the Cardiff Works service in 2021/22 to ensure barriers are reduced for ethnic minority job seekers.</li> <li>➤ Continue to ensure an outreach, engagement, and communications programme are delivered to raise awareness of the service to ethnic minority job seekers.</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
<p>Page 27</p> <p>1.7</p> 	<p><b>Support career progression routes for ethnic minority employees at Cardiff Council</b></p>	<p><b>Tracey Thomas</b></p>	<p><b>March 2023</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>The Council welcomes the Taskforce’s recommendation to develop a new approach to support ethnic minority staff progression and increase representation and diversity at senior grades.</p> <p>To inform our approach, HR have collaborated with the Black Asian and Minority Ethnic Staff Network to understand the experiences and reflections of our existing workforce in accessing development and progression opportunities. We also sought to explore ethnic minority staff’s views on which approaches would work best to support our talented ethnic minority staff to grow and develop into leadership roles in the future. To build this improved organisational understanding and set our</p>			

<p>future direction, a staff engagement exercise was completed to explore how our existing ethnic minority staff perceive and experience barriers to progression within the organisation and ask where our future approach should focus.</p> <p>Using this feedback and after reviewing best-practice evidence on effective leadership and development programmes which seek to achieve improved diversity at senior and managerial grades, a Leadership and Development Programme has been designed in partnership between HR and the Chair of the Black, Asian Minority Ethnic Staff Network.</p> <p>This programme will include modules on key leadership skills for the modern public sector workforce, and content specific to the complex and varied work of Councils which future leaders need to understand, such as:</p> <ul style="list-style-type: none"> <li>• Digital public services</li> <li>• The Council’s budgetary processes and financial landscape</li> <li>• Working with elected members and the role of the Council’s Cabinet and other democratic functions</li> <li>• Partnership and cross-sector collaboration</li> </ul> <p>The Leadership and Development Programme will include opportunities to achieve accredited qualifications such as the Institute for Leadership and Management Level 3 and Level 5 awards and provide resources to support reflective self-study and personal development. Participants will also be paired with a senior management mentor from the OM+ grade, to support skill-sharing throughout the programme and for staff to develop their internal network.</p> <p>The Programme is intended to offer a variety of pathways for individuals at all levels and will also encourage employees to:</p> <ul style="list-style-type: none"> <li>• take responsibility for their own learning &amp; development through self-study</li> <li>• map their own personal development journey – allowing options for them to focus on their strengths and/or areas for development</li> </ul> <p>Employees will also be encouraged to form supportive networks for sharing good practice and problem solving.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Launch and deliver a pilot Leadership and Development Programme for groups underrepresented at a senior level in 2022/23 and roll it out over the course of 2023/24.</li> <li>➤ Establish a programme of ‘reverse mentoring’ between participants on the Learning and Development programme and the Council’s senior management.</li> </ul>		
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Reference	Recommendation	Lead Officer	Timeline
 1.8	<p>Cardiff Council should explore employer led ESOL (English for Speakers of other languages) for Council Staff where their language skills are a barrier to progression</p>	<p>Hayley Beynon</p>	<p>Spring 2023-ongoing</p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>Following the progression of this recommendation, the Council consulted with key staff from the identified service areas in the Taskforce Report to seek their views on this development support offer. This proposal generated significant interest and a positive response, and in response relevant and accessible ESOL provision is visible to these staff through communications and direct engagement with this section of the Council workforce, who often have less digital access due to the nature of their professional roles.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Provide and promote ESOL provision to support staff whose English language skills are a potential barrier to career development within the organisation.</li> <li>➤ Explore options with Public Services Board partners for enhanced English language trainings for staff looking to step into management and leadership positions.</li> </ul>			

## Measuring Progress: Employment & Representative Workforce

We will monitor these commitments through the following Key Performance Indicators:


- Number of ethnic minority staff at senior grades (G8-10) and OM+ of the Council.
- Percentage of our tendered contracts including a social value commitment to increase ethnic diversity of workforce.
- The number of attendees at 'Lunch and Learn' lessons.
- Number of staff completing Unconscious Bias and Microaggression training.
- Monthly applicants from ethnic minority backgrounds into Cardiff Works.
- Number of staff completing ESOL courses.

## Education and Young People

Reference	Recommendation	Lead Officer	Timeline
 <p>2.1</p>	<p><b>Strengthen the local approach to bullying and prejudice-related incidents at school</b></p>	<p><b>Gill James</b></p>	<p><b>Jan 2022- On-going</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>Following the progression of this recommendation from the Race Equality Taskforce, a significant piece of work has been completed to respond and implement a new local approach to respond to these issues, building upon the new anti-bullying guidance from the Welsh Government '<i>Rights, Respect, Equality – Challenging Bullying, Hate Crime and Hate Incidents</i>'.</p> <p>Launched by the Welsh Government's Education Minister on a visit to Radyr Primary School, the Welsh Government's guidance is aimed at governing bodies for maintained schools, local authorities, parents, carers and children and young people.</p> <p>The guidance outlines the Welsh Government's expectations for schools to:</p> <ul style="list-style-type: none"> <li>• take a proactive approach to prevent bullying</li> <li>• have an anti-bullying policy linking to school policies including behaviour and safeguarding</li> <li>• record and monitor incidents of bullying to help take pro-active steps to challenge bullying</li> <li>• regularly review their anti-bullying policy and strategy in collaboration with their learners at least every 3 years</li> </ul> <p>The Welsh Government has also produced new resource toolkits to accompany the new guidance. This includes factsheets, supplementary guidance, an incident recording template forms and best practice case examples to help local authorities support schools in challenging bullying.</p>			

<p>As the Race Equality Taskforce encouraged our local approach to beyond just ‘anti-bullying’ and also specifically recognise the issues of racism and racist bullying faced by many ethnic minority young people in schools, we have expanded upon the Welsh Government’s core guidance and developed a comprehensive local response framework.</p> <p>This approach recognises the finding of Show Racism the Red Card that many teachers do not know how to appropriately support young people who are dealing with racist bullying and don’t always recognise the severity of such incidents.</p> <p>Our expansion of the core guidance to include ‘hate crime and hate incidents’ ensures the severity of racist bullying is clear to schools across the local authority.</p> <p>According to UK law a hate crime is defined as ‘Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person’s race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender.’</p> <p>A hate incident is any incident which the victim, or anyone else, thinks is based on someone’s prejudice towards them because of their race, religion, sexual orientation, disability or because they are transgender. Not all hate incidents will amount to criminal offences, but it is equally important that these are reported and recorded appropriately.</p> <p>To develop our local guidance and training framework, a Task and Finish Group was established and produced a ‘Rights Respect Equality’ action plan and a local document of expanded guidance regarding the appropriate response to hate-related and prejudice-based behaviours in school settings.</p> <p>As part of the guidance, a clear procedure for recording incidents of bullying in all schools has been introduced and the reporting arrangements will ensure accurate recording and reporting of both hate crime and hate incidents. A clear procedure for collating data at a local authority level has also been created to identify and respond to trends.</p> <p>To introduce and support the application of this guidance, a training programme for schools, local authority staff and school governors was also created.</p> <p>The guidance and training were launched in December 2021. To launch these resources and the approach, a training session for primary and secondary head teachers was completed on the 8th and 9th December 2021. A Governor training session was also delivered on 12th January 2022.</p>		
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<p>A wider programme of training was rolled out across Cardiff Primary and Secondary schools with training led by the Council's Ethnic Minority and Traveller Achievement Service and Cohesion Team. Further information sessions regarding the guidance also took place in Special Schools and wider local authority staff in early 2022.</p> <p>The Council's website was updated to include reference to this guidance and ensure our approach is visible for parents and the wider school community.</p> <p>Monitoring of this guidance and its impact is on-going.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ We will strengthen the local approach to bullying by delivering the 'Rights, respect, equality – challenging bullying, hate crime and hate incidents' anti-bullying strategy for Cardiff, embedding guidance and training, and monitoring its impact.</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
<p>P 2 33</p> 	<p><b>Extend the work of Schools of Sanctuary to a broader network of schools and support the participation of refugee and asylum-seeking communities</b></p>	<p><b>Gill James</b></p>	<p><b>Autumn 2021 - On-going</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>Following this recommendation, the Council's Education team have worked to promote the Schools of Sanctuary programme to schools across Cardiff and introduce new schools to this area of work.</p> <p>The Education Team have worked with the local Cardiff City of Sanctuary group to develop their new Resource Pack for schools, which showcases the good practice of existing schools in Cardiff who participate in the programme. This has helped to raise the profile of the Schools of Sanctuary Programme and encourage new schools to participate.</p> <p>We invited schools from across Cardiff to participate in a scaling-up programme, through which a group of volunteers with personal experience of forced migration will support schools' journey through an appraisal process. A participation budget has</p>			

been made available to assist with volunteer expenses recognising the specific participation barriers faced by refugee and asylum-seeking communities.

Following these communications from the Council's Education Team, many schools have now introduced Schools of Sanctuary to their governing bodies and to the wider school community and have expressed their intention to participate in the scaling-up programme.

As of the beginning of September 2022, there are now eleven schools that have achieved School of Sanctuary status.

They are:


- Allensbank Primary
- Adamsdown Primary
- The Cathedral School
- Fitzalan High School
- Grangetown Primary
- Herbert Thompson Primary
- Llanishen High School (accreditation to be revisited as over 3 years)
- Stacey Primary
- St David's Church in Wales Primary School
- St Mary the Virgin Church in Wales Primary School
- St Monica's Church in Wales Primary School

There are at least another 20 schools that are well on their way with their School of Sanctuary journey and the work continues to be the focus of our Closing the Gap team in Education

Schools of Sanctuary was included in the Effective practice publication from Estyn (12/09/22) following their inspection of Cardiff Education in November 2021.


*'Cardiff was officially recognised as a City of Sanctuary in 2014. Schools in Cardiff embrace this and have become part of the growing Schools of Sanctuary network across the UK. Schools are creating a culture of welcome and inclusion whilst raising awareness of the issues faced by refugees and asylum seekers. The programme is being driven by the central team and through the authority's Race Equality Action Plan.'*

**Commitment:**


<ul style="list-style-type: none"> <li>➤ Offer schools a SofS package to all Cardiff schools including staff and governor training, resources, access to guest speakers from the asylum seeker and refugee community, and pupil workshops</li> <li>➤ Monitor the SofS package through engagement with schools and data collection.</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
 <p>2.3</p>	<p><b>Develop resources and training for Cardiff schools to support anti-racism action and counter racial prejudice</b></p>	<p><b>Gill James</b></p>	<p><b>Dec 2021- On-going</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>In July 2021, following the agreement of this recommendation by the Task Force, the Council’s Education Team invited a leading figure in school-based anti-racism action, Rachel Clarke, to meet with our local team and plan a local approach to support future anti-racism practice in our schools. Rachel Clarke is a serving Deputy Head Teacher currently working in a London school and is Betty Campbell’s granddaughter.</p> <p>Rachel shared with local staff her anti-racism best-practice toolkit, ‘Promote Equality’, which has successfully been delivered within her school.</p> <p><b>‘Promote Equality’: An Anti-Racism Toolkit</b></p> <p>The Promote Equality tool aims to:</p> <ul style="list-style-type: none"> <li>• <i>Educate:</i> Tools and resources are provided will enable organisations to inform participants, broaden understanding and challenge perspectives and facilitate a holistic approach to the promotion of equity.</li> <li>• <i>Empower:</i> The programme provides participants with a platform to share views in a collaborative, positive and controlled environment, empowering individuals to seek out solutions and drive change from within.</li> </ul>			

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<p>• <i>Enhance</i>: Schools are supported to create positive change, which leads to increased student and staff satisfaction and wellbeing.</p> <p>Through a four-phase, 18-month training and development programme, starting with self-reflection and understanding within the school community, the Toolkit supports a shared programme of activity is developed which considers experiences, practices, and culture within the organisation.</p> <p>This includes focus groups with staff, pupils and the wider school community and the development of knowledge and understanding of the ways in which racial inequality is experienced in society. This work informs the development of a joint anti-racist approach across all parts of the school community</p> <p>This Toolkit was shared at Cardiff's Headteachers' conference in July 2021 and schools were invited to come forward for an initial evaluated pilot which would test the application of the Promote Equality toolkit in our local context. Mount Stuart Primary school came forward to be the primary school pilot partner and St Teilo's Church in Wales High School came forward as a secondary school pilot partner.</p> <p>Mount Stuart Primary School launched the toolkit in their school on Wednesday 1<sup>st</sup> December 2021 and is currently progressing on their anti-racism development journey using the Promote Equality toolkit.</p> <p>St Teilo's Church in Wales High School are currently in discussions for launch dates.</p> <p>Further to this, the education team are also building effective relationships with DARPL (Diversity and Anti-Racist Professional Learning), a resource hub with a Welsh perspective in raising multi-disciplinary racial consciousness. The organisation has multiple peer reviewed free courses to engage with, as well as connections to training providers across a variety of diversity and anti-racist practices that can be utilised in the education setting.</p> <p>The team are also exploring partnership options with DARPL and our fellow Local Authority colleagues across South Wales to develop effective monitoring techniques to better understand the impact of anti-racist training in our schools.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Deliver 'Promote Equality' Anti-Racism Training Tool pilot in Cardiff Schools monitoring its progress, development, and impact.</li> </ul>		
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➤ Expand anti-racist processes within schools including training and understanding of racism as a safeguarding concern, pending resources and guidance from Welsh Government from their Anti-Racism Wales Strategy.			
Reference	Recommendation	Lead Officer	Timeline
 2.4	<b>Support the diversification of the teaching workforce through a teaching assistant ‘Step into Teaching’ Programme</b>	Gill James	Spring 2023-on-going
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>The Central South Consortium responded to this recommendation by conducting a consultation with the current Teaching Assistant workforce. This was promoted via the consortium networks, in school bulletins, directly to head teachers and on social media.</p> <p>Data gathered from this survey informed us that approximately 8% of Cardiff teaching assistants are from a Minority Ethnic background, this is considerably higher than the teaching workforce which stands at approximately 1.5%. The consultation report also informed us that teaching assistants from a Minority Ethnic background were more likely to have high qualifications, and high ambitions for their career, but levels of English language and financial strains of further training were considerable barriers to progression.</p> <p>This proposal has received approval and support from the Welsh Government, Education Workforce Council, and Cardiff &amp; Vale College, and we have been collaborating with them on ideas to design a draft concept.</p> <p>Proposed next steps are to hold a large event in Cardiff targeting teaching assistants. The event will consist of keynote speakers, information stalls and seminars, to build relationships, ensure teaching assistants know the options available to them and signpost to further resources.</p>			

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<p>The Central South Consortium will use this opportunity to better understand the needs of teaching assistants and partner with providers, where necessary, to address those needs.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Develop a ‘Step into Teaching’ programme for ethnic minority Teaching Assistants in Cardiff.</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
	<p><b>Increase representation of ethnic minority residents in school leadership through a School Governors entry programme</b></p>	<p><b>Suzanne Scarlett</b></p>	<p><b>March 2023.</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>Following the progression of this recommendation, an equality monitoring survey was developed to achieve baseline data capture around current governor diversity. Data gathered from this survey will inform the recruitment plan and future recruitment campaigns to increase the diversity of school governors.</p> <p>A ‘<i>Future Governors Programme</i>’ is being developed with Mount Stuart Primary School and Fitzalan High School to develop governor diversity. These forums provide a place where schools can build relationships with parents and parents will be able to learn about governing processes around schools and the role of school governors. This prepares parents to step into governor roles when they become available.</p> <p>This model is intended to create new opportunities to connect with parents from our diverse school population and attract new governor talent, where school leadership reflects school diversity.</p> <p>Work is also underway with third sector organisations who work with local ethnic minority parents and the wider community to promote the governor role. A partnership has been formed with United 2 Change with two briefing sessions already held with</p>			

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<p>parents promoting the role and a wider event and campaign being planned later in the autumn term for parents from diverse backgrounds across the city.</p> <p>Together with the Governing Bodies, schools, and the Education Workforce Council, we are now seeking to develop an effective recruitment plan, for both governor and school staff positions, and make sure these opportunities are visible to local ethnic minority parents and the wider community. We are also currently in discussions with Educators Wales on potential support and funding for a dedicated recruitment campaign supporting this objective.</p> <p>Governing Bodies have also been asked to implement Professor Charlotte Williams' recommendation that a specific 'equality &amp; diversity governor' should be identified for every school. We will be supporting this process during 2022-2023 by providing guidance and training opportunities.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Implement 'Future Governors Programme' pilot to parent forums in Cardiff Schools.</li> <li>➤ Deliver a Governor responsible for 'Equality, Diversity and Inclusion' for each school with training and guidance.</li> <li>➤ Develop a recruitment plan for increasing diversity of School governors in partnership with schools and the Education Workforce Council</li> </ul>			
<p><b>Reference</b></p>	<p><b>Recommendation</b></p>	<p><b>Lead Officer</b></p>	<p><b>Timeline</b></p>
<p> 2.6</p>	<p><b>Increase visibility of Black and Ethnic Minority role models and public education on Black History through events programming</b></p>	<p><b>Sian Sanders</b></p>	<p><b>Oct 2022-On-going</b></p>
<p><b>Response: Recommendation Accepted</b></p> <p><b>Progress to Date:</b></p>			

<p>We have launched the inaugural Betty Campbell Monument Lecture in October 2022.</p> <p>This was delivered in partnership with Monumental Welsh Women, Studio Response and the Senedd and we have agreed our commitment that this will form part of annual programming to raise awareness of Black History in Wales.</p> <p>The first lecture was held during Black History Month 2022 at the Pierhead Building in Cardiff Bay. Councillor Julie Sangani, Cabinet member responsible for Equalities, gave a short address and Professor Olivette Otele, the Distinguished Professor of Legacy and Memories of Slavery SOAS at University of London, gave the lecture. The lecture was sponsored by Cardiff Council and the Senedd.</p> <p>The annual lecture will focus on themes connected to Betty Campbell's legacy and values that she stood for in her life and career, for example:</p> <ul style="list-style-type: none"> <li>• Black History and multiculturalism: exploring Betty's work and the inclusion of Black History in the new curriculum for Wales.</li> <li>• Making connections across communities and borders: Betty was inspired by the Civil Rights movement in America and Wales has strong cultural connections with the movement - including the Wales Window of Alabama in the Sixteenth Street Baptist Church in Birmingham, Alabama.</li> <li>• Celebrating pioneering Welsh women, including the Monumental Welsh Women statue project.</li> </ul> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Support Monumental Welsh Women in sponsoring the Annual Betty Campbell Monument Lecture.</li> </ul>		
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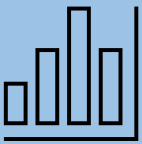




## Measuring Progress: Education & Young People

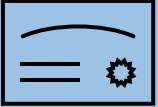
We will monitor these commitments through the following Key Performance Indicators:

- Percentage of Schools in Cardiff adhering to the '*Rights, Respect, Equality – Challenging Bullying, Hate Crime and Hate Incidents*' anti-bullying strategy for Cardiff and undertaking relevant training.
- Number of Schools of Sanctuary in Cardiff.
- Number of schools participating in the Anti-Racism 'Promote Equality' Training pilot.
- Percentage of teaching workforce from an ethnic minority background in Cardiff schools.
- Number of people from an ethnic minority background in leadership positions in Cardiff Schools.
- Number of schools with a Governor who is responsible for 'Equality, Diversity and Inclusion'.

## Citizens Voice

Reference	Recommendation	Lead Officer	Timeline
 <p>3.1</p>	<p><b>Improve data collection and analysis on civic participation</b></p>	<p><b>Gary Jones and Dylan Owen</b></p>	<p><b>On-going</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>As requested by the Race Equality Taskforce, an Equalities data capture survey was completed for current elected members between July-November 2021, which provides an initial data benchmark for diversity in democracy. We shared the findings of this survey with the Taskforce, and they are included in their report.</p> <p>Equality Monitoring Data has been captured again at the commencement of a municipal term and this will be on-going gathering of data which will be available in the public domain.</p> <p>A new statutory Citizen’s Engagement Strategy is currently being developed focussing on improving levels of engagement with Council decision making and consultations from more civically disengaged groups, including people from a Minority Ethnic background. All Council surveys and consultations currently collect data on respondents with results analysed and presented by demographic group in addition to headline findings.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Collect and publish equality data for Council members.</li> <li>➤ Develop new proposals to improve engagement with Minority Ethnic communities as part of the Council’s statutory participation strategy</li> </ul>			

Reference	Recommendation	Lead Officer	Timeline
 <p>3.2</p>	<p><b>Complete benchmarking against the Race Alliance Wales manifesto for action on Race Equality in Wales</b></p>	<p>Dylan Owen</p>	<p>Dec 2022</p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>A public signing of the RAW manifesto was completed by the Leader of the Council in March 2022 as part of our commitment to continued action on racial injustice in Wales.</p> <p>With the support of two members of Race Alliance Wales who have been engaged in the Cardiff Race Equality Taskforce's Programme, we have completed a benchmarking assessment of the Council's current practice, policy priorities and service delivery against the areas of the RAW manifesto relevant to the responsibilities of local government. This is being used to inform Directorates on areas for improvement in 2022/23.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Benchmark RAW manifesto actions with RAG system and implement actions into corporate delivery where possible</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
 <p>3.3</p>	<p><b>Scope opportunities to increase youth participation and engagement with civic processes and develop mechanisms to support ethnic minority youth representation in politics and decision-making</b></p>	<p>Suzanne Scarlett</p>	<p>On-going</p>
<p><b>Response: Recommendation Accepted.</b></p>			

<p><b>Progress to Date &amp; Next Steps:</b></p> <p>Following the development of this recommendation, new approaches are being established by the Council's Youth Services Team and Youth Council through internal service delivery. These participation models will, as suggested by the Taskforce, be developed by young people, to ensure they reflect their preferred participation methods and focuses on the issues which matter most to them.</p> <p>Cardiff Youth Services Team (CYST) have expanded the information we collect of children and young people who we engage with to include more around protected characteristics including ethnicity so that we can monitor this better.</p> <p>CYST have actively promoted engagement opportunities with staff and organisations who work with marginalised and underrepresented groups</p> <p>Cardiff Youth Council now has 65 registered members 27 of whom identify as being from a minority ethnic group which is 42% which stands slightly above numbers of ethnic minority young people in Cardiff (36%). Similarly, the Child Friendly City Survey undertaken in 2022 received over 7,000 responses, 36% of whom were from an ethnic minority background.</p> <p>Cardiff Youth Council is also in the process of appointing a young person into the role of Equality and Diversity Officer who's aim is to further improve representation from all underrepresented groups. This person will form part of the youth council executive and will work with elected members and officers, and they should be in position within the next few weeks, we are currently going through the application process.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Develop programmes of work to encourage young people from ethnic minority backgrounds to engage and participate in local politics and decision-making.</li> </ul>			
<p><b>Reference</b></p>  <p>3.4</p>	<p><b>Recommendation</b></p> <p><b>Cardiff Council's elected members should support the Welsh Local Government Association's Diverse Council Declaration, to support diversity in democracy and representation of ethnic minority groups in the capital city</b></p>	<p><b>Lead Officer</b></p> <p><b>Gary Jones</b></p>	<p><b>Timeline</b></p> <p><b>Oct 2022-Ongoing.</b></p>
<p><b>Response: Recommendation Accepted.</b></p>			

### Progress to Date & Next Steps:

Cardiff Council is committed to continuing to improve diversity in democracy across the city and become a Diverse Council. The WLGA's Diverse Council Declaration was agreed by Council in February 2022, providing a clear public commitment to improving diversity in democracy in our city and signals intent for future collaboration to improving representation in democracy and participation.

Following the adoption of the Diverse Council Declaration, a local 'Diversity in Democracy' action plan has been developed and will be considered by the Council's Democratic Services Committee in November 2022.

The commitments made by the Diverse Council Declaration will require action on a number of areas, which span actions required by both Democratic Services and political groups to achieve maximum impact. The commitments are referenced below:

#### Broaden Local Democratic Representation

We will:

- Encourage and enable people from underrepresented groups to stand for office.
- Seek support from all elected members and political groups on the council to work with local party associations to encourage recruitment of candidates from underrepresented groups.
- Ensure residents from all communities understand the role and functions of local councillors and the council

#### Support involvement with local decision-making

We will:

- Proactively engage organisations supporting under-represented groups to enhance democratic awareness.
- Support the work of the Race Equalities Task Group in developing proposals to engage our city's diverse neighbourhoods within local democracy.
- Establish a mentoring programme - working with a range of stakeholders to provide a pipeline of mentors and mentees for prospective councillors.

Support Councillors to discharge their responsibilities effectively

We will:


- Provide flexibility in council business and activities to support Elected Members and allow them to meet their personal, professional, cultural and caring commitments and responsibilities.
- Work in accordance with the standards set out in the Wales Charter for Member Support and Development.
- Continue to demonstrate our duty of care for elected members by supporting their wellbeing and safety needs when performing their role as councillors.
- Achieve the [Wales Charter for Member Support and Development](#) to demonstrate the highest possible standards of support and development for our elected members to assist them in meeting the challenges and expectations of their diverse roles ranging from of community leader to their special responsibilities within the Council.
- Ensure that all elected members have the opportunity to take up the allowances and salaries to which they are entitled, particularly any reimbursement for costs of care, so that all elected members receive fair remuneration for their work and that the role of an elected member is not limited to those who can afford it.
- Continuing to promote the highest standards of behaviour and conduct from elected members and those intending to stand for office on the Council.

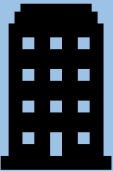
Develop a 5-year action plan to delivery our Diverse Council commitment:

- The development of the Diverse Council Declaration Action plan 2022-27 is underway, in consultation with representative and community groups and is planned to be initially considered by the Democratic Services Committee in November 2022.

**Commitment:**

- Develop an action plan to adhere to the Diverse Council Declaration's Commitments

Reference	Recommendation	Lead Officer	Timeline
 3.5	Improve representation from Cardiff's ethnic minority communities in key decision-making panels	Gary Jones	Oct 2022-on-going
<p data-bbox="78 467 638 499"><b>Response: Recommendation Accepted</b></p> <p data-bbox="78 536 526 568"><b>Progress to Date &amp; Next Steps:</b></p> <p data-bbox="78 604 1780 668">This recommendation forms part of the Diverse Council declaration's commitments and work to support this will be developed and agreed as part of the Diversity in Democracy Action Plan, which will be developed following the local government elections 2022.</p> <p data-bbox="78 705 1668 769">This recommendation will be incorporated into our future Diversity in Democracy Action Plan developed following the local government elections 2022.</p> <p data-bbox="78 837 280 869"><b>Commitment:</b></p> <ul data-bbox="78 906 1803 1042" style="list-style-type: none"> <li>➤ Agree that Council representatives and senior managers will endeavour to only participate in conferences/panels which include a diverse membership.</li> <li>➤ All Council run events will endeavour to ensure a diverse panel/line-up of speakers.</li> </ul>			

Reference	Recommendation	Lead Officer	Timeline
 3.6	<b>Broaden participation and accessibility in city planning and ensure there are appropriate platforms for engagement and community voice in the design of the city</b>	<b>Simon Gilbert</b>	<b>Autumn 2023</b>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>A programme of future engagement has been designed by the Council's Planning Team in response to this recommendation, which was approved by the Taskforce in December 2021.</p> <p>Planning have committed to implementing further creative methods such as developing short films or animations and expanding the use of their 'virtual room' on their website with easily accessible guides to their vision and objectives. This will be developed and utilised further as the Replacement Local Development Plan (LDP) progresses.</p> <p>The team have also agreed to research best practice methods in England &amp; Wales, by utilising existing networks, such as Core Cities, speaking with other local authorities, and Wales wide forums. It is hoped that by exploring other methods, Planning will be able to learn and implement positive engagement practices within a Cardiff context.</p> <p>Furthermore, Planning have agreed to develop a public survey to assess public knowledge of planning within the city and explore any misunderstandings regarding planning processes and the way decisions are made. Using the survey findings, accessible guides and messaging will be created, led by public needs. This may include, for example, specific user-friendly guides and key information about the Council's Local Development Plan.</p> <p>Beyond the Local Development Plan itself, the Planning team are committed to improving their visibility and community engagement methods, and explore holding direct stakeholder engagement sessions, working with community groups and elected Members to establish better relationships with communities across the city. This includes dedicated outreach efforts to ensure Cardiff's ethnic minority communities are included in important conversations about the design and future of the city.</p> <p>For example, in May 2022, officers attended an event at the Grangetown Pavilion; with a particular focus on raising awareness in the local community of the replacement LDP and Housing regeneration schemes. We are also continuing to engage with colleagues at</p>			




<p>Cardiff University and utilising networks to ensure our LDP community engagement strategy is targeted and representative of all communities.</p> <p>The Planning Department are keen to facilitate a similar “meet the Planners” session in Butetown in the next 6 months.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Ensure Planning encourage ethnic minority communities to engage in LDP and planning policy and embed effective community engagement processes, including further direct stakeholder engagement sessions and focus groups and face to face drop in events in local communities and closer working with community groups and elected members.</li> </ul>		
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## Measuring Progress: Citizen’s Voice

We will monitor these commitments through the following Key Performance Indicators:

- Percentage of elected Members from an ethnic minority background.
- Percentage of respondents to Ask Cardiff from an ethnic minority background.
- Percentage of respondents to Child Friendly City survey from an ethnic minority background.
- Percentage/ number of respondents from an ethnic minority background to the LDP consultation and engagement.


## Health

Reference	Recommendation	Lead Officer	Timeline
 <p>4.1</p>	<p>Improve ethnicity recording within the healthcare system, for both patients and staff</p>	<p>Mitchell Jones</p>	<p>Ongoing  Summer 2023</p>
<p><b>Response: Recommendation Accepted</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>The information in relation to the ethnicity of our staff is recorded through NHS Wales' Electronic Staff Record (ESR) system. To date, 90.3% of the workforce have provided data in relation to ethnicity; however, it is important to note that 3.4% of those who have provided data have actively chosen not to disclose their ethnicity. The data gap is therefore currently 9.7%. The health board are currently running a campaign to improve the equality data in ESR. The campaign has not made the impact that had been hoped and the working group are exploring other opportunities to engaging with staff to update their ESR records, through the use of posters and table toppers to be displayed in canteens.</p> <p>Through ESR, the health board are able to collect information in relation to starters, leavers, and promotions within the health board and are therefore able to measure whether we are becoming more representative of our communities at all levels, providing the data is available in ESR.</p> <p>Currently, the health board do not collect equality information in relation to any of our HR processes, including grievances and disciplinaries. Conversations are ongoing between our Equity and Inclusion Team, People Services, and Information Governance around how this information can be collected.</p> <p>Welsh Government are currently scoping a Welsh Workforce Race Equality Standard (WRES), similar to that currently in place in NHS England. The work being undertaken in relation to data improvement will support the health board in becoming an anti-racist organisation, as well as help with any future WRES reporting.</p>			

<p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ To continue with the campaign to improve our staff equality data in ESR.</li> <li>➤ To continue to explore how we can collect equality data on our HR processes.</li> </ul>			
<p><b>Reference</b></p>	<p><b>Recommendation</b></p>	<p><b>Lead Officer</b></p>	<p><b>Timeline</b></p>
<p>4.2</p> 	<p><b>Complete further investigation into the experiences of ethnic minority staff and patients and review the complaints and resolution procedure</b></p>	<p>Angela Hughes/ Mitchell Jones</p>	<p>Aug 2023</p> <p>In progress</p>
<p><b>Response: Recommendation Accepted</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>Following the agreement of this priority, an engagement exercise was completed with UHB Staff to understand the experiences and reflections of our ethnic minority staff in relation to racism in the workplace. This has informed the review of the complaints and resolution policy which is used to respond to any issues which arise within the workplace.</p> <p>A summary of the approach is set out below.</p> <p>If an individual as a patient has raised racism as a concern in terms of care or treatment, the first course of action should be to talk to the staff involved with that care as soon as possible to raise their concern. The staff will try to resolve those concerns immediately. If this does not help, or someone does not want to speak to the staff, they can <a href="#">contact the health board or trust's complaints team</a>. It should be noted that racism can be directly reported to the police</p> <p>They can use a procedure known as Putting Things Right to raise concerns about clinical care or experience. Once someone has raised a concern, the complaints Health Board or trust's complaint team:</p> <ul style="list-style-type: none"> <li>• will listen to the concerns to try to resolve them as quickly as possible</li> <li>• will look into the concerns and speak to the staff involved in that care or treatment</li> </ul>			

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<ul style="list-style-type: none"> <li>• may offer a meeting to discuss those concerns</li> <li>• will put the individual in contact with the right person to help</li> <li>• will let the individual know what they have found and what they are going to do</li> </ul> <p>The complaints team should respond to the individual within 30 working days of receiving a concern. If they cannot reply in that time, they will explain why and let the individual know when to expect a response. Some concerns may take longer to look into.</p> <p>In terms of staff, as a health board we are committed to supporting our employees to work in a positive workplace which promotes healthy working relationships. We know from evidence that it's the quality of our interaction that means the most. It determines not just our own wellbeing but impacts on the service we provide to our patients and other service users.</p> <p>As a health board, we are currently drafting an organisational anti-racist action plan. As part of the plan, we are exploring undertaking listening exercises to improve our understanding of the lived experience of our ethnic minority staff.</p> <p>Since the launch of the Government's <i>A Healthier Wales</i>, it is important for us to do whatever we can to improve how we work with each other. In full partnership with NHS, trade unions and Welsh Government experts and leaders across Wales, we have developed this very different approach. The <a href="#">Respect and Resolution Policy</a> is a huge step to embedding a positive culture of managing difficult relationships, with early intervention and prevention with the aim to secure constructive and lasting solutions to workplace disagreements, conflicts and complaints. This policy has replaced the UHB's previous Dignity at Work Policy and Grievance Policy.</p> <p>More information on the Respect and Resolution Policy and other useful resources within the toolkit are below and via the <a href="#">NHS Wales Health Education and Improvement Wales (HEIW) Website</a>.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Complete a review of the experience of ethnic minority staff and patients in using the 'Putting Things Right' process</li> <li>➤ Complete the anti-racist action plan</li> </ul>		
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Reference	Recommendation	Lead Officer	Timeline
 <p>4.3</p>	<p><b>Improve engagement and communication with Black and Ethnic Minority communities around health and health improvement</b></p>	<p><b>Lorna Bennett</b></p>	<p><b>March 2023</b></p>
<p><b>Response: Recommendation Accepted</b></p> <p><b>Progress to Date &amp; Next Steps:</b></p> <p>An Engagement Coordinator focusing on ethnic minority health and health improvement has continued to be funded through Cardiff and Vale University Health Board with Prevention and Early Years (Public Health) resources.</p> <p>The purpose of the role is to 'lead the coordination of actions across the Council and its partners to develop effective partnership models to address health inequalities experienced by ethnic minority communities, including the identification and implementation of policy and service interventions and regular engagement with relevant statutory, voluntary and private sector stakeholders and communities on issues relevant to health equity'. The initial focus of the role has recently been expanded in line with the 'Amplifying Prevention' work – a collaborative approach between Cardiff Council, the Vale of Glamorgan Council and CVUHB which aims to reduce health inequities across 3 main areas of focus: childhood immunisation, bowel screening and the 'Move More, Eat Well' strategy.</p> <p>The action plan prioritises stakeholder engagement and looks to identify and overcome barriers to accessing prevention services. The coordinator has also led health promotion events, all underpinned by communications that build trust and share good practice.</p> <p>The past six months of this post have included the following actions:</p> <ul style="list-style-type: none"> <li>Continued coordination of the Ethnic Minority Health Subgroup which supports the health board's outreach activity</li> <li>Proactive work with local communities to improve bowel screening rates, childhood immunisation rates and work towards improving move more, eat well activities in local communities.</li> <li>Improving knowledge and understanding of the importance of bowel screening, childhood immunisation and move more, eat well initiatives through training and engagement with local communities.</li> <li>Identifying and overcoming barriers to bowel screening and childhood immunisation by creating pathways to support communities.</li> </ul>			


Work has been completed on a survey to investigate barriers to uptake of childhood immunisation among ethnic minority communities and a short report has been completed; an equivalent survey to investigate barriers to uptake of bowel screening has also been completed and a report will be prepared. Focus groups with adults aged 40 years and over are planned to explore barriers amongst ethnic minorities to moving more and eating well. A touch-point mapping exercise will also identify opportunities to provide health promotion materials and training to communities and professionals about the range of topics through their existing interaction with Local Authority and health services.


The funding for this work is currently confirmed until end March 2023.

**Commitment:**

- Expand scope of work to focus on Move More Eat Well actions, in addition to existing priorities.

## Criminal Justice

Reference	Recommendation	Lead Officer	Timeline
5.1 	<b>Commit to test approaches &amp; collaborate on data exploration at both a local and national level- Following the Criminal Justice in Wales approach (formerly All Wales Criminal Justice Board)</b>	<b>Rachel Allen</b>	<b>Nov 2022</b>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>To support the work of the Race Equality Taskforce’s Criminal Justice Sub-Group, initial mapping of existing criminal justice data and analysis of current data practice was completed to understand current data trends and gaps at the local level.</p> <p>This exercise indicated some areas of data capture needed further investigation and development across the criminal justice sector. This is because the current data is not providing a sufficiently comprehensive view of ethnicity data across the whole system due to discrepancies in ethnicity recording practice and consistency in recording across agencies.</p> <p>This finding aligns with the national findings of the Criminal Justice in Wales’ Race Equality Data Task Group, and it was agreed that the local Cardiff partnership would support the further investigation and development of criminal justice data sets, supporting relevant pilots and requests as the national Data Task Group’s project develops.</p> <p>The aspiration of Criminal Justice in Wales Data Task Group is to commission independent analysis to unpack the initial data return from criminal justice agencies and identify agency-specific recommendations to improve data quality.</p> <p>Following completion of this initial step, the group will aim to create an All-Wales disproportionality dashboard to monitor progress on addressing ethnic disparities within the criminal justice system and inform future policy decisions.</p> <p>The disparity Dashboard draft will be shared with public service partners in November 2022</p>			

<p>Further to this, on a local level, criminal justice partners in Cardiff have offered to work in continued partnership with local community organisations to share relevant local data that would be helpful in informing and shaping community-led solutions to crime prevention, diversion, and rehabilitative support.</p> <p>Criminal Justice Anti-Racism Action Plan for Wales was published 8th Sept with exploration of data approaches as a key deliverable. <a href="https://southwalescommissioner.org.uk/c22-0119-criminal-justice-anti-racism-action-plan-for-wales-report-criminal-justice-in-wales-interactive.pdf">c22-0119_criminal-justice-anti-racism-action-plan-for-wales_report_criminal-justice-in-wales_interactive.pdf</a> (<a href="https://southwalescommissioner.org.uk">southwalescommissioner.org.uk</a>)</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ The Criminal Justice in Wales Data Task and Finish Group will work with the Cardiff Community Safety Partnership to produce data products to reflect and enhance the understanding of local issues, so we can respond accordingly.</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
<p>Page 56</p>  <p>5.2</p>	<p><b>Cardiff's local criminal justice partnership should develop and invest in tailored or alternative approaches to diversion for Ethnic Minority groups</b></p>	<p><b>Sian Rees (PCC)</b></p>	<p><b>Autumn 2022-On-going</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>This is a significant area of work for the Council and its partners, through the Youth Justice Service, Community Safety Partnership, Youth Services, Children's Services, and many other areas of statutory and non-statutory service delivery.</p> <p>This work will be long-term and collaborative, requiring ongoing coordination between service areas in the council, across public services and in partnership with communities.</p> <p>The Cardiff Community Safety Partnership have developed a working group which have met multiple times and have made progress on several actions under the overarching proposal.</p>			



Most notably to this proposal was to deliver against the action to *'involve and engage Minority Ethnic groups participation to understand their experience and inform the design of future model'*

As part of the working group, we have accomplished the following to date:

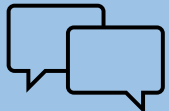
- Completion of a survey by Ethnic Youth Support Team to inform our future work.
- Designing future targeted engagement focusing on early contact with the justice system and any opportunities, particularly missed opportunities, for early intervention.
- Agreed to develop understanding not only of access to diversionary interventions, but also experiences of police custody and barriers that may have reduced take up of offers of diversionary support (e.g. length of time spent in police custody).
- Undertaken and completed a literature review on existing research on diversionary interventions for youths and adults, with a focus on racial disproportionality.

Through undertaking these activities, we have concluded that there is still much we need to understand to make concrete proposals in this space.

The current action plan monitoring progression of this proposal includes the following:

To involve and engage Ethnic Minority groups participation to understand their experience and inform the design of future models.

- A deep dive will be conducted into the offence types committed by White and Ethnic Minority groups and the outcomes received. This could be done by running an exercise with people (across all age groups) coming into custody so we can better understand what the barriers may be for them accessing diversionary outcomes.
- When there needs to be an Appropriate Adult, every effort should be made to have an Appropriate Adult from that individual's ethnic group/background to aid with any mistrust issues. There may be a potential for members of the community to volunteer to act as the Appropriate Adult.
- Training should be increased for all professionals within the custody environment around the difficulties that ethnic minorities may face when they encounter the police and other criminal justice agencies so that decision makers and front-line staff can be aware of, and responsive to the needs of these groups.
- There is also a recommendation that data quality and monitoring should be improved across all areas to monitor outcomes and any disparities relating to ethnicity more consistently and effectively.

<p>In addition to this action plan, we propose to undertake a piece of targeted research and engagement, building on work completed by local partners, and looking at distinct system touch points to support us in developing recommendations for long term system change.</p> <p>This is not just focussed on policing but will encompass the pre-court space of which multiple partners operate within, this includes youth and adult criminal justice and commissioned services.</p> <p>Under the Youth Justice and Women in Justice Blueprints a funding proposal has been submitted and approved by Welsh Government to better understand disproportionality in Out of Court Disposals/Pre-Court diversion. Through progressing the recommendation under this workstream it has become clear that this is a complex area and to better inform long term system change we need to better understand the complexities, influences and barriers that impact on this pivotal point in the system. Early indications from Welsh government are positive however we are awaiting formal confirmation. As funding has now been confirmed it is proposed that a researcher working alongside public health Wales will work with partners in Cardiff to better understand this touch point, its influences/barriers and propose recommendations. This research will be supported by a steering group consisting of key stakeholders.</p> <p>We know that the earlier we intervene and divert away from the criminal justice service the better outcomes achieved and we want to ensure that this an equal opportunity for all.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ The Criminal Justice Partnership will undertake specific research around alternative approaches to diversionary processes, the findings will be presented to the Community Safety Partnership Board in order to support the delivery of the subsequent recommendations.</li> </ul>			
Reference	Recommendation	Lead Officer	Timeline
 <p>5.3</p>	<p><b>Cardiff's local criminal justice institutions should invest in a comprehensive Cultural Competency training approach</b></p>	<p><b>Emma Wools</b></p>	<p><b>Spring 2023-ongoing</b></p>
<p><b>Response: Recommendation Accepted.</b></p>			

**Progress to Date:**

Local criminal justice partners have committed to pilot a new Cultural Competency training approach agreed by Criminal Justice in Wales Race Equality Plan. This is an opportunity to collaborate with partners across Wales and will support the development of a training schedule to reach a wide range of frontline staff in 2023-2024.

The Youth Justice Service’s Leadership Board will also participate in this training during the first year as part of their commitment to taking every step to eliminate unconscious bias in service delivery and develop support for young people that is sensitive to their personal experiences and identity.


The Cardiff Community Safety Partnership have also agreed to work in collaboration with ethnic minority communities in Cardiff to help shape wider cultural competency training programmes, ensuring local criminal justice organisations are culturally aware of their local communities.

The Cardiff Community Safety Partnership intend to launch the delivery of the pilot training programme across the Cardiff Criminal justice service landscape in 2023.

The Cardiff Community Safety Partnership will support the progression of this programme, and additionally seek funding from local partners to invest in sustainable and comprehensive Cultural Competency training programmes, ensuring the programme reaches to the widest range of staff.

**Commitment:**

- Cardiff Community Safety Partnership will support the delivery of a Cultural Competency training approach, evaluate impact, and then seek sustainability for future programmes.

Reference	Recommendation	Lead Officer	Timeline
 5.4	<b>Sustain and develop current efforts to increase workforce representation within the Criminal Justice System. Develop a wider approach to addressing representation across the sector, in partnership with the Public Service Board.</b>	Emma Wools	On-going

**Response: Recommendation Accepted.**

**Progress to Date:**

South Wales Police recognises the benefits of a diverse workforce and has worked hard in recent years to become more representative of the communities that we police.

For many years, our recruitment practices have been recognised as implementing best practice, for example, we have for the past 20 years, used anonymised application forms, used accredited interviewers, having been made aware of potential biases in the recruitment process and we monitor our attraction, selection, and general employment processes to identify any adverse impact on under- represented groups. We are a “Living Wage” employer.

Recognising the importance of and our commitment to increasing our workforce representation, we have invested in recent years in a dedicated team focused on recruitment from our ethnically diverse communities; this includes full time dedicated resources, with a budget and focussed outreach to support our recruitment campaigns including undertaking positive action activities to encourage candidates from under- represented groups to apply for a career in policing. Whilst we have made progress, moving from 1.7% of our police officers being from a Black, Asian, or Minority Ethnic background to a predicted 4% by March 2023. Despite considerable leadership effort and investment, we have found it difficult to recruit people of colour into South Wales Police.

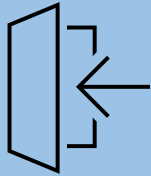
Whilst there has been some progress, we know that we must, and can do more to become a first-choice employer for our most underrepresented communities.

Our “Towards a more representative workforce strategy 2021-2026” outlines our ambition to be bold and progressive in our approach to address the under-representation of our diverse communities, particularly within our ethnically diverse communities. It includes a revised governance structure to ensure oversight of our planned activities and further investment in dedicated resources to support our outreach work and positive action activities.

The strategy highlights 3 key work streams including;

1. Leadership and Culture
2. Attraction and Selection
3. Engagement and Progression

Specifically, in relation to our Attraction and Selection workstream, we intend to:

<p>• Optimise our approach to positive action and refining our attraction communication strategy to ensure we reach a broader, diverse audience that creates trust and confidence in our policies and procedures. This includes working with key partners and influencers in areas with our most diverse communities.</p> <p>• Develop our strategic partnerships with schools, universities, local authorities etc to build gateways into policing, for example, developing work experience programs for schools with our highest levels of ethnically diverse communities, raising awareness of our apprenticeship, intern and graduate programs with our diverse communities and supporting bursaries for students from ethnically diverse backgrounds to undertake the pre join degree in policing.</p> <p>Further to this, the Criminal Justice Anti-Racism Action Plan for Wales was published 8th Sept 2022 which notes workforce representation as a key deliverable. <a href="https://www.southwalescommissioner.org.uk/c22-0119-criminal-justice-anti-racism-action-plan-for-wales-report-criminal-justice-in-wales-interactive.pdf">c22-0119 criminal-justice-anti-racism-action-plan-for-wales report criminal-justice-in-wales interactive.pdf (southwalescommissioner.org.uk)</a></p> <p><b>Commitment:</b></p> <p>Community Safety Partnership will support Criminal Justice partners in their efforts to increase workforce transformation.</p>			
<p>Reference</p>	<p>Recommendation</p>	<p>Lead Officer</p>	<p>Timeline</p>
<p>5.5</p> 	<p><b>Cardiff Partnership to take part in the DWP Kickstart Scheme as another means to address workforce representation.</b></p>	<p><b>Emma Wools</b></p>	<p><b>Complete</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>The Department of Work and Pensions (DWP) Kickstart programme finished in Spring 2022. His Majesties Prison and Probation Service (HMPPS) offered 47 posts across prison &amp; probation services for the whole of Wales. For Cardiff, they recruited for 11 posts in total, 8 for the prison service and 3 for probation.</p>			

All the posts were designed at entry grade level and were administrative/reception type roles. HMPPS did not specify a requirement for any essential skills, experiences or qualifications for these posts and will be providing a full suite of training as part of the role.

OPCC appointed 1 young person from the Cardiff area. The individual started in March 2022 and worked within the central team and closely with OPCC's Community Engagement Manager on projects such as 'Young Voices Work' in Cardiff. We are awaiting feedback on this post.


The Cardiff Community Safety Partnership fully supported the utilisation of the DWP Kickstart scheme and its positive impact on young people in Cardiff.

The Partnership hope more Criminal Justice organisations are able make use of similar schemes and continue taking steps towards a representative workforce at all levels of organisations.

**Commitment:**

The Cardiff Community Safety Partnership will continue to support DWP employability schemes and will raise awareness with other criminal justice services.

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Reference	Recommendation	Lead Officer	Timeline
 <p>5.6</p>	<p><b>Develop improved mental health service pathways and integrated training and support for Police Officers as first responders</b></p>	<p><b>Angharad Metcalfe</b></p>	<p><b>Autumn 2022</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>The Office of the Police and Crime Commissioner has committed to working in partnership with the Health Board and third sector to develop a pilot Sanctuary Service in Cardiff.</p>			

## What does a Sanctuary offer?

- Access support at the point of crisis. It aims to reduce the amount of time between the onset of crisis and the point at which help is received using a peer led model.
- Support workers with lived experience of mental illness can make the individual comfortable and confident to visit the sanctuary.
- Face-to-face support for individuals in crisis to receive support without the need for medical assessment and they will not be transported to the Sanctuary against their wishes. The aim of this is to reduce the stigma and shame around mental health and traditional methods of support as well as helping guests to relax.
- A quiet space away from the home environment and conventional ways of dealing with mental health crisis, allowing the individual the opportunity to work through their crisis without the need to come into contact with mental health services or the criminal justice system.

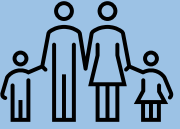
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A working group has been established to help develop, monitor, and evaluate the Sanctuary Service pilot. This will include a specific strand of activity focusing on ethnic minority groups. This service will support integration with mental health services for both adults and children and the overarching service model will be designed in partnership by people with lived experience of mental health crisis.


The Cardiff and Vale University Health Board has put a funding bid to Welsh Government for a Cardiff sanctuary. The Health Board, working with key stakeholders, including representatives have drafted a service specification to go out to tender. At the Cardiff and Vale Crisis Care Concordat forum on the 29/09/2022, we were informed that the procurement exercise has not yet started. Hopefully it will be advertised in October/ November 2022.

The Cardiff and Vale University Health Board have established a multi-agency Mental Health Sanctuary Retreat Task and Finish group to oversee development of pilot. The PCC's Substance Misuse and Mental Health team are represented on this group as are EYST and have attended other Sanctuaries such as the Bridgend Wellbeing Retreat and Torfaen & Blaenau Gwent Sanctuary to learn from their experience.

Aiming for the service launch to coincide with 111 press 2 service going live, initially for referrals only (not open access). The provisional 'go-live' date 111 press 2 is 19<sup>th</sup> December, however recruitment has been problematic. Initially the 111 press 2 service will be available 8am – midnight 7 days/week and it will increase to a 24/7 provision when the recruitment process has

<p>been completed. Work is underway on the mapping of services and pathways, ensuring effective processes and communication for receiving services.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Community Safety Partnership are committed to supporting the development of mental health service pathways and will continue to evaluate the service landscape, ensuring it reflects the community's needs.</li> </ul>			
<b>Reference</b>	<b>Recommendation</b>	<b>Lead Officer</b>	<b>Timeline</b>
	<p><b>Develop new mechanisms to strengthen community engagement and voice in the work of the Community Safety Partnership.</b></p>	<p><b>Sian Sanders (CCC)</b></p>	<p><b>Spring 2023</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>The Community Safety Partnership are currently reflecting on different community engagement methodologies being run in the community, to ensure the most appropriate mechanism can be established. These models and proposals will be brought to the Partnership for their consideration in due course.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Develop an effective mechanism for communities to engage with the Community Safety Partnership and ensure diverse community voices are heard.</li> </ul>			



Reference	Recommendation	Lead Officer	Timeline
 <p>5.8</p>	<p><b>Support capacity-building with ethnic minority led voluntary sector groups to strengthen collaboration and delivery within criminal-justice related voluntary sector services.</b></p>	<p><b>Sian Sanders</b></p>	<p><b>Jan 2023-on-going</b></p>
<p><b>Response: Recommendation Accepted.</b></p> <p><b>Progress to Date:</b></p> <p>Throughout the course of the Race Equality Taskforce, the Criminal Justice Sub-Group has supported knowledge exchange across the broad criminal justice sector and voluntary sector, including engagement with community institutions which primarily focus on ethnic minority groups. This has provided a space for collaboration and solution-finding and will need to transition to a new longer-term arrangement as the Taskforce programme ends.</p> <p>Following the closure of the Race Equality Taskforce’s Criminal Justice Sub-Group, the Community Safety and Cohesion teams have partnered with key voluntary sector leaders on developing a potential lead convenor for regular network meetings to support ongoing collaboration on race equality within criminal justice voluntary sector services.</p> <p><b>Commitment:</b></p> <ul style="list-style-type: none"> <li>➤ Deliver a collaborative network in partnership with Third sector organisations to support ethnic minority led organisations access appropriate advice and guidance needed to provide for their communities.</li> </ul>			

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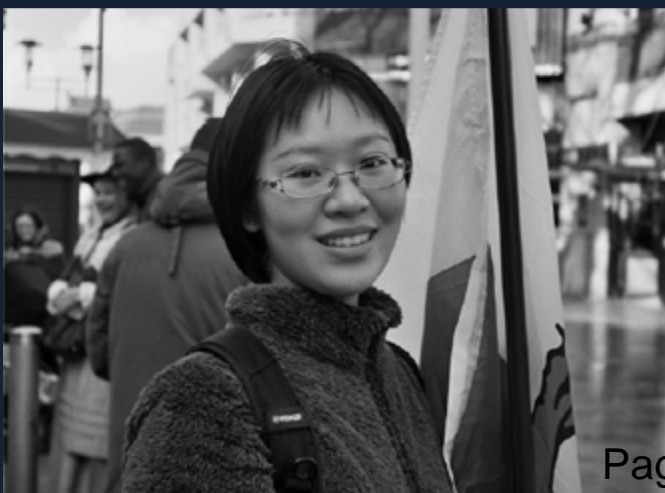
REPORT OF

# CARDIFF

# RACE EQUALITY

# TASKFORCE

MARCH 2022



# FOREWORD

## A Statement from Cardiff's Race Equality Taskforce Chair

Chairing Cardiff's Race Equality Taskforce offered me an incredible opportunity to serve my city, community and all Cardiff residents. As a lifelong resident of Cardiff and a serving Councillor for Butetown, home to one of the United Kingdom's longest standing Black communities, this journey has been one of great personal significance.

Over the course of the Taskforce programme, I have been inspired by the aspirations and vision of Cardiff residents, from all walks of life, in delivering action on race inequality in our city.

Creating the Taskforce was Cardiff Council's pledge to use our convening power as a local authority to shape change in our capital city, contributing to a fairer and more equal society for our Black and ethnic minority communities, both longstanding and new.

The brutal killing of George Floyd in the USA rightfully surfaced feelings of enormous anger and sadness about the ongoing scale of global racial injustice that confronts our society today. This was a call to action for us all to do more and our city was unafraid to be at the forefront of change and the collective fight for racial justice. The disproportionate impact of COVID 19 on Black, Asian and other ethnic minority communities, visible both locally and nationally, further underscored the longstanding challenge that we must address - making Cardiff, Wales and the UK more equal places for all of their citizens.

The proposals outlined in this report have been developed collaboratively. I am grateful for the efforts of many local people and organisations across Cardiff in co-producing the recommendations outlined throughout this report and helping the Taskforce to find meaningful opportunities for change in our city.

Throughout the Taskforce programme, we have reached out to engage local people and community institutions to ensure that the proposals we developed accurately reflected the experiences and priorities of Cardiff's ethnic minority communities and have worked hard to

incorporate what communities, and the academic evidence on ethnic inequality, have told us.

I would like to thank all staff, partners and residents for taking part in this programme and in particular recognise the leadership of our Taskforce members for acting as critical friends during this process, by providing vision, challenge and insight throughout. Collectively, we have approached this important mission with intent and optimism for a better future. This has led to a strategic approach that is built on collaboration, understanding and mutual trust. This report is a body of work our city can take pride in.

We intend this to be a practical plan, outlining specific actions to be taken across all the key policy areas which emerged as our priorities, selected for their potential for change and their significance in shaping the experiences of and opportunities for Black and ethnic minority Cardiffians.

Our work on race equality acts as a blueprint for Cardiff's future work on equality, diversity and inclusion more broadly, which aims to create a workforce that not only invites diverse talent, but also actively builds a workforce that truly represents the community it serves through the people that we recruit and nurture.

I hope and expect that many of our recommendations will benefit White working class communities in our city too, as many require actions which also contribute to reducing socioeconomic inequality in a general sense.

It is important to recognise that there are limits what local efforts to transform ethnic minority representation and opportunities can achieve. We hope that the visionary local approach outlined in this report will be reinforced nationally, for example through national targets, robust equalities legislation including the current protections of the Equality Act 2010 and Human Rights Act 1998, and that the UK and Welsh Governments will join us in efforts to set a positive example through promoting greater diversity in Whitehall and the Welsh Civil Service. To support local action, we



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also emphasise the need for appropriate funding arrangements for local government which support the delivery of local action on race equality. For this reason, the Taskforce welcomed the publication of the Welsh Government's Race Equality Action Plan for consultation, and the strong collaboration with ethnic minority residents of Wales that has informed its production so far.

Our ambitious approach in developing our Taskforce and this report has put us at the forefront of race equality in local government in not only Wales, but the whole of the UK. I am deeply proud to have been part of this journey of change as Chair of the Cardiff Race Equality Taskforce, but I am intensely aware that achieving real change requires race equality to be 'everyone's business' and for anti-racist action to be incorporated into the design and everyday life of our city.

For this reason, we should all take heart in the shared ownership and commitment to deliver on the areas of action identified in this report, and the breadth of partnership activity already underway which demonstrates a clear vision and commitment to creating a more equal capital city across our public services, voluntary sector and within our communities.

This may be the conclusion of our city Taskforce's work, but I am confident that this is only the beginning of our city's efforts to end long-standing racial injustices for good.

**Cllr Saeed Ebrahim**  
**Ward Member for Butetown**  
**Chair of Cardiff's Race Equality Taskforce**  
**2020-2022**

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# INTRODUCTION

The tragic death of George Floyd in the USA saw protests take place across the world, including in Cardiff, as part of the Black Lives Matter movement. This led to a reflection, both on how the history of Black communities in the UK is treated, and on the ongoing challenges that ethnic minority people continue to face in today's society.

Over the past eighteen months, Cardiff's Race Equality Taskforce has been tasked with identifying practical opportunities for change to improve race equality in our city, finding new ways that we could deploy local levers to improve outcomes for Ethnic Minority residents.

This report outlines the work completed by Cardiff's Race Equality Taskforce between July 2020-March 2022.

This work has been facilitated with the support of staff from Cardiff Council, and with the collective support and contributions of city public and voluntary sector partners, including Cardiff & Vale University Health Board, South Wales Police and many others.

## Why was Cardiff's Race Equality Taskforce created?

The context for the establishment of the city's Race Equality Taskforce had been well documented in several recent studies, reviews and inquiries, which revealed the extent of racial inequality in the UK, including:

- The Race Disparity Audit, published in 2017, showed inequalities between ethnicities in educational attainment, health, employment and within the criminal justice system.
- The McGregor-Smith Review of race in the workplace, published in 2017, found people from Black and Minority Ethnic backgrounds were still disadvantaged at work and faced lower employment rates than their White counterparts.
- The Lammy Review, also published in 2017, found evidence of bias and discrimination against people from Ethnic Minority backgrounds in the justice system in England and Wales.
- The Windrush Lessons Learned Review, published in March 2020, found the Home Office showed, "institutional ignorance and thoughtlessness towards the issue of race."

Whilst the issue of racial injustice is therefore a UK-wide one, the creation of our Taskforce recognised the important influencing role of local leadership in demonstrating the possibility for change.

We committed to testing new approaches to improve outcomes for ethnic minority citizens using local transformation levers and identifying solutions with local ethnic minority residents, as experts through their personal lived experience.

In the data section of this report, we describe some of the most insightful data on race inequality in our city in more depth. Cardiff's data story on ethnic inequality is by no means unique or unusual in the UK context but demonstrates both complex and alarming realities.

Achieving change requires openness and transparency in describing the reality of racial inequality through institutional and system data and throughout the Taskforce's programme, we have sought to utilise the available data to bolster our understanding of both the issues and the solutions.



## The Taskforce's mandate and objectives

Through a report to Cardiff Council's Cabinet, it was agreed that a Race Equality Taskforce for Cardiff would be established to work to the following objectives:

- Work with Cardiff's communities and organisations to improve and prioritise race equality to achieve an inclusive, cohesive, thriving and representative city;
- Guide Cardiff's policy and strategy developers to make sure race equality is included in all of their work;
- Use the Council's convening power to advance race equality in the public, private and voluntary sector, working closely, where required, with the Cardiff Public Services Board;
- Coordinate actions and recommendations to advance race equality, focusing on priority work-streams, identified in consultation with the city's ethnic minority residents;
- Report our progress on race equality and the general impact of inequality and discrimination on the ethnic minority communities of Cardiff.

## Our starting point

As our starting point, Cardiff Council had already taken several positive steps to support race equality as a major employer and public institution in the city, including:

- Appointing an Executive Sponsor for race – this is the Chief Executive
- Signing the Business in the Community Race at Work Charter as a clear commitment towards race equality
- Examining and publishing workforce and ethnicity pay gap data to strengthen understanding of the existing workforce and inform the approach to recruitment and progression for ethnic minority staff
- Implementing a new approach to recruitment which seeks to minimise unconscious bias in the shortlisting process by removing personal details such as name and address
- Refreshing and relaunching the equality training offer, available to all staff, and the organisational training programme for Equality Impact Assessments
- Published a new Strategic Equality Plan for 2020-2024 which clearly articulates the role of key council services in addressing all forms of inequality in the city, with specific consideration given to areas such as ethnic inequality in the local labour and housing markets.

# ABOUT CARDIFF'S RACE EQUALITY TASKFORCE

To ensure that our work was informed and shaped by local ethnic minority residents, the development of the Race Equality Taskforce's programme of proposals had been a highly participative process.

We invited local residents to join our city's Race Equality Taskforce through an open and accessible public appointment process. This attracted 60 applications and through this process, 14 members were appointed from diverse professional backgrounds, varied minority ethnicities, ages, genders and walks of life. Achieving a broad representation of experiences and expertise was clearly important to achieving a quality and comprehensive range of local proposals in the Taskforce programme.

Applications for membership of the Taskforce were assessed against the following person specification:

### Knowledge

- Knowledge of and commitment to race equality
- Knowledge of key social and economic policy issues affecting Black and Asian Minority Ethnic communities in Cardiff and Wales

### Experience

- Proven experience of working in partnership to deliver on shared goals

### Skills

- An ability to foster strong relationships, engage others and communicate effectively.

Members were also selected to achieve an optimum balance of representation across the following sectors:

- Children and Young People
- Voluntary Sector and Community Organisations
- Public Services
- Major Employers and Small-to-Medium Sized Enterprises (SMEs)
- Culture and the arts
- Education including Further and Higher Education
- Sport
- Trade Unions



**APPENDIX B TO THIS REPORT PROVIDES A BIOGRAPHY FOR ALL TASKFORCE MEMBERS, EXPLAINING THEIR PROFESSIONAL AND PERSONAL EXPERIENCE RELEVANT TO THE TASKFORCE'S PROGRAMME, INCLUDING THE CHAIR, GLLR SAIED EBRAHIM.**

Against these criteria, the following membership was appointed.

- Asmut Price- Chair of Cardiff Council’s Black and Asian Minority Ethnic Network
- Emma Wools –Deputy Police and Crime Commissioner, Office of the Police and Crime Commissioner for South Wales
- Keithley Wilkinson- Equality Manager, Cardiff & Vale University Health Board (December 2020-December 2021 due to moving to a new role)
- Catherine Floyd/ Locum Consultant in Public Health, Public Health Wales (December 2020-September 2021) / Sian Griffiths – Consultant in Public Health Medicine (December 2021- March 2022)
- Marcus Walters- Director, Burges Salmon
- Anita Naoko Pilgrim- University Lecturer in Race, Gender and History, Open University
- Najma Hashi- Change Maker Support, Office of the Future Generations Commissioner
- Salah Mohamed- Former Chief Executive of the Welsh Refugee Council
- Yaina Samuels- Founder of NuHi Training Social Enterprise
- Daniel Mapatac- Final year student at Cardiff University
- Eshaan Rajesh- Sixth Form Student at Fitzalan High School and Representative of Cardiff Youth Council
- Yusef Jama- Cardiff-based Taxi Driver and Unite Cardiff Branch Secretary for the Taxi Trade
- Cllr Daniel De’Ath- Current Councillor for Plasnewydd and former Lord Mayor of Cardiff (2018-2020)
- Hilary Brown- Chair of Butetown Community Centre

## Identifying our Taskforce Priorities

A rapid and focused consultation was undertaken in August 2020 to seek ethnic minority residents’ views on the priorities for the Taskforce. This was to inform the establishment of the Taskforce’s work-streams, each of which would coordinate strategic evidence, practice and policy reviews and produce proposals for action.

Here we provide a summary of the consultation findings.

A total of 869 responses were included in analysis, of which 40% were from Ethnic Minority backgrounds.

The following areas were proposed as the following initial areas of focus for the Taskforce’s consideration. We sought views on these five proposed areas as they were identified as areas in which a programme of action could have a positive impact on the outcomes of Ethnic Minority residents and communities in Cardiff in both the short and longer term.



They are also areas where both local and national evidence tells us that there is a long way to go to achieve race equality at a UK level.

Proposed areas of focus	Summary of responses
What more can be done to ensure that the Council’s membership and workforce represents the full diversity of the city it serves;	74.9% of respondents supported this priority, 91% of respondents from ethnic minority backgrounds supported this priority.
The experiences of ethnic minority children and young people in education, in alignment with the Welsh Government’s recently announced working group focusing on this area;	79.1% of respondents supported this priority, 88.4% of respondents from ethnic minority backgrounds supported this priority
Supporting ethnic minority communities to access employment opportunities;	75.1% of respondents supported this priority, 93% of respondents from ethnic minority backgrounds supported this priority.
Diversity in the public realm, working closely with the Taskforce recently established by the Welsh Government to audit statues, street and building names to address Wales’ connections with the slave trade;	59.4% of respondents supported this priority, 78.7% of respondents from ethnic minority backgrounds supported this priority
Supporting the civic and democratic involvement of ethnic minority communities through voter registration and participation in the Census 2021	84% of respondents supported this priority, 91.5% of respondents from ethnic minority backgrounds supported this priority

We also asked respondents to prioritise these areas of focus, and the results are summarised below:



**APPENDIX C OF THIS REPORT PROVIDES THE FULL FINDINGS OF THIS CONSULTATION IN DEPTH.**

## Establishing the Taskforce

The inaugural convening of the Race Equality Taskforce took place on 1st December 2020 and the appointed Chair and membership confirmed their priority areas of work. The selection of these priorities was informed by comprehensive analysis of the available ethnic inequality data and the views of city residents, as captured by the Taskforce's consultation.

The Taskforce confirmed the following three priority themes to be led and developed by Cardiff Council. Whilst Cardiff Council hold an important convening role across these themes of work, the Taskforce recognised that they also required broad partnership focus that reached beyond the Council itself and into other parts of the public, private and voluntary sector. As such, the sub-groups developing the work programme were multi-agency and benefited from broader expertise from the city and beyond.

- A) Employment and Representative Workforce:**
- B) Education and Young People**
- C) Citizen's Voice**

Responding to residents' views within the consultation that further areas of Taskforce focus should include Health and Criminal Justice, the Taskforce sought further collaboration with the Cardiff & Vale University Health Board, South Wales Police and Cardiff Community Safety Partnership to create and progress a programme of work against these two additional themes.

These public sector bodies and partnerships offered their support to the objectives of the Taskforce Programme and two further thematic sub-groups were created:

- D) Health**
- E) Criminal Justice**

## The role of the sub-groups

Each sub-group was tasked with coordinating strategic evidence, practice and policy reviews in order to produce a proposal of short, medium and long-term recommendations for consideration by the Taskforce and, where approved by the Taskforce membership, these proposals would be progressed to the appropriate decision-making board as recommended city-led activity.

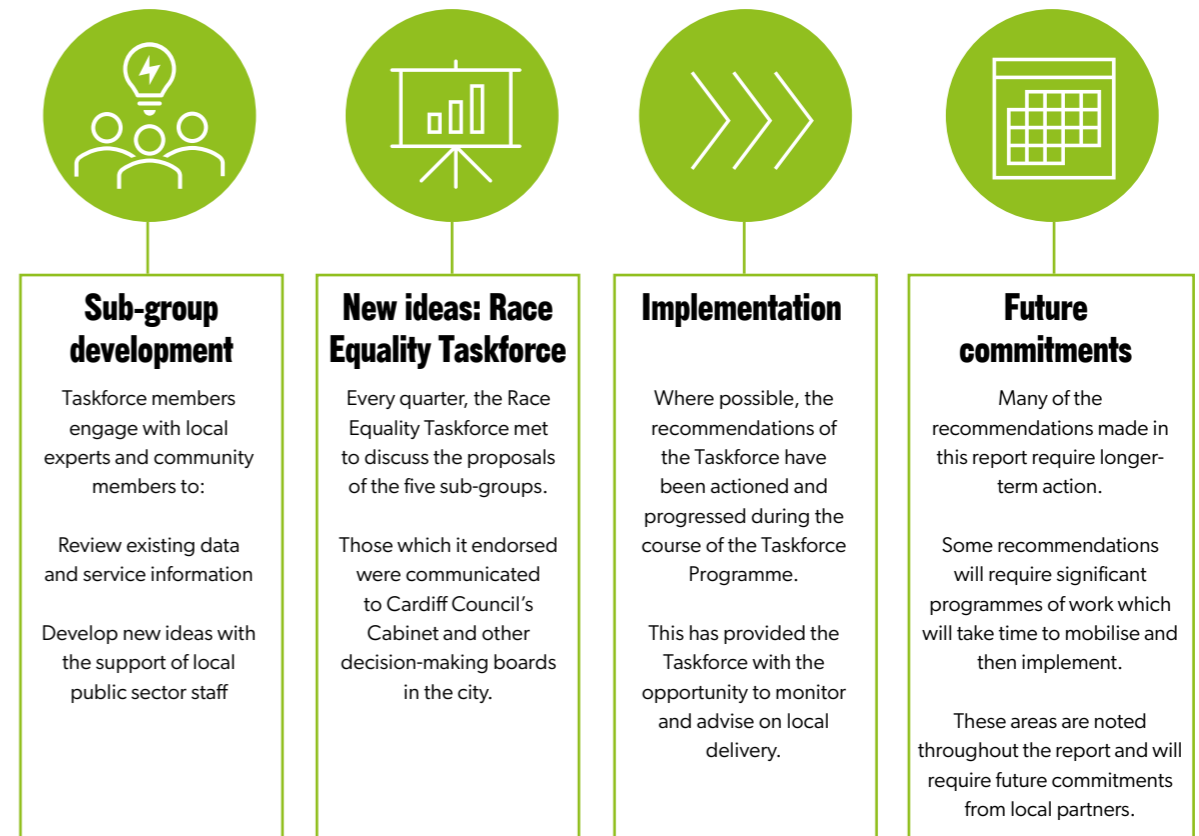
The membership of all work streams included representation from Taskforce members with expertise in the relevant field, Council officers and other stakeholders from across the public, private and voluntary sector as appropriate for each theme. This approach enabled the Taskforce to benefit from the expertise of credible practitioners who offered advice and supported the identification of substantive and evidence-based recommendations to improve race equality in Cardiff within each stream, and the authentic voice of ethnic minority residents through representation in all sub-groups.

During the 18-month Taskforce programme, each sub-group produced comprehensive proposals for change.

Their proposals were presented at quarterly meetings of the Race Equality Taskforce and following discussion, where adopted, they were progressed to the relevant decision-making board as recommendations.

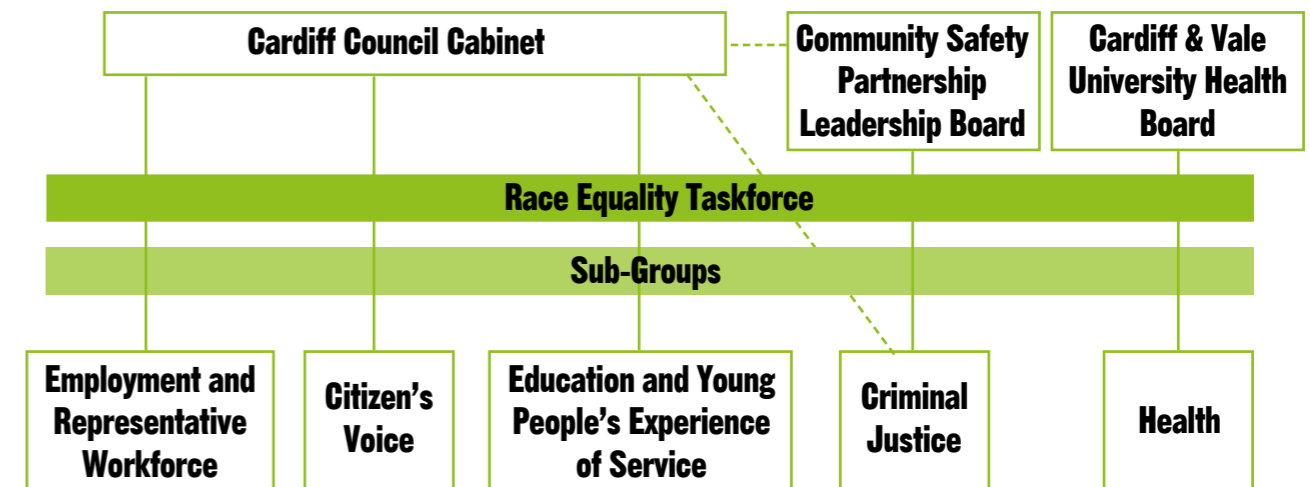


## City-led ideas for change: Our process



## Progression of Taskforce proposals into decision-making boards for the city

The governance for the Race Equality Taskforce's recommendations is explained in the graphic below



A comprehensive Terms of Reference was developed to support the Taskforce membership in delivering their role and confirm the destination of its recommendations to Cabinet, the Community Safety Partnership and Cardiff & Vale University Health Board's Welsh Language and Equality Board. Terms of Reference were also produced to support each sub-group. These are available as Appendix D to this report.



## What about the Diversity in the Public Realm theme & Sir Thomas Picton Statue at City Hall?

A feature of the Black Lives Matter movement is its call to reassess how individuals in British history with involvement in slavery and the British Empire were commemorated.

In Cardiff, this focused on the statue of Sir Thomas Picton in the Marble Hall at Cardiff's City Hall, whose military career and death at the Battle of Waterloo drove his original inclusion in the 'Heroes of Wales' collection. Amongst growing awareness and understanding of the brutal nature of his Governorship of Trinidad and his involvement in slavery, many city residents added their names to a call to move the statue to a more appropriate location.

A democratic mandate was sought for the proposed removal of this historic monument through a debate and decision by Full Council, which enabled the Council to consider the practicalities of safely removing the statue and managing any associated implications to the listed status of the Marble Hall. In both the Taskforce's public consultation and across the Taskforce's membership, there was a clear view that the Taskforce's programme of work should focus on areas of policy change which have the greatest potential to reshape disadvantaged outcomes for ethnic minority groups in the immediate and longer term.

Recognising that a decision had been taken by elected members to coordinate the removal of the Sir Thomas Picton Statue from City Hall, that the Council had committed to a process to achieve this and that a national audit was underway; 'The Slave Trade and the British Empire: an audit of commemoration in Wales' led by Gaynor Legall, the Taskforce chose to focus their local work on other policy areas and did not adopt the Diversity in the Public Realm Theme for their programme.

This does not affect the status or progression of the commitment to remove the Sir Thomas Picton statue, which has been sustained through the relevant planning procedures. Information regarding this continues to be published on the Council's planning portal and where appropriate, further communications will be shared regarding this issue, where significant milestones have been reached.



# DATA ON EQUALITY AND ETHNIC DIVERSITY IN CARDIFF

In this chapter, we provide an overview of some relevant evidence on ethnic diversity and race equality in Cardiff. The evidence presented below draws upon and layers a range of sources, from the Census and School Census, Annual Population Survey, data from the UK Government's Ethnicity Facts and Figures portal and the Welsh Index of Multiple Deprivation.

**FURTHER DATA ON EACH OF THE TASKFORCE'S THEMATIC PRIORITIES IS ALSO PROVIDED BY CHAPTER LATER IN THIS REPORT E.G. COUNCIL WORKFORCE DATA CAN BE FOUND IN THE EMPLOYMENT AND REPRESENTATIVE WORKFORCE CHAPTER.**

## Cardiff's race equality data story: Insights and limitations

It is widely accepted that the quality of ethnicity data held by public services needs to improve, this is true not just for public services who have engaged in Cardiff's Race Equality Taskforce, but across a wide range of public services at a UK level. As such, future data collection and use in service design has emerged as a priority area for each of the Taskforce's sub-groups, as a recommendation for public bodies in the city and beyond.

There are currently limitations in the available data at both a UK, Wales and local level from which to fully understand the issues and connectors, and from which the Taskforce would have hoped to measure the future impact of their recommended policy changes and new approaches. For this reason, in future service delivery the Taskforce encourages robust data collection on ethnicity and for future service evaluations to be cognisant of ethnicity data to support an improved body of evidence on 'what works' in addressing racial inequality and enabling the sharing of this learning more broadly.

It is important to recognise that the data presented here can never be fully comprehensive and our Taskforce were cautious to avoid making too broad generalisations from the available data. At the individual level, experiences will not always conform to the trends outlined in the high-level

data presented here and some ethnic minority groups are, for example, well-represented in some professional occupations and outperform their White peers in terms of academic attainment.

Whilst there are some clear trends in the data presented, ethnic minority groups are not homogenous, and the Taskforce and its sub-groups were mindful to adopt a nuanced approach when considering their recommended local interventions on ethnic inequality, underrepresentation and factors of disproportionality.

Despite the current data limitations, like any other policy area, adopting an evidence-led approach enabled the Race Equality Taskforce to consider how their recommendations could be measured for impact and evaluated to inform future policy approaches. Notwithstanding the current limitations in the availability of relevant data, the Taskforce sought to use the data which is available to shape their proposals.

Together, the data sources referenced in this report still provide a rich picture of race equality in the city and detail some clear disproportionality in terms of deprivation and lack of opportunity experienced by some ethnic minority communities in Cardiff.

The data paints a complex picture across the city, and it is accepted that the drivers of these inequalities are multifaceted and not all levers are within the control of the Council or local public services, but the data provides a starting point for analysis and policy development and its use must be a central component of future action on racial injustice at a city, national and UK level.



cyfrifiad  
census  
2021

### Spotlight on: Census 2021

The Census is a survey conducted by Office for National Statistics. It takes place once every 10 years, with the first official census taking place in 1801.

The Census is useful as it provides very comprehensive and detailed population data, and that is why we often refer to Census 2011 data throughout this report- as it is the most recently available data which provides insight into the experiences and lives of ethnic minority residents in our city.

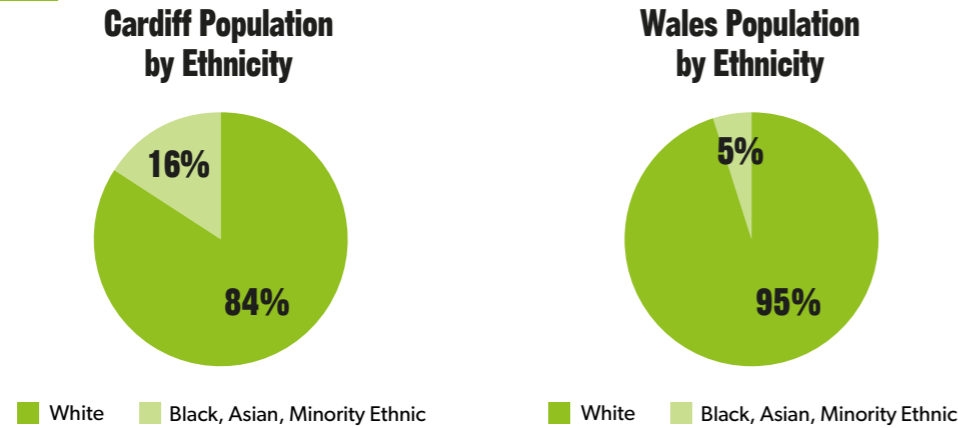
The Census is important because the detailed information it collects regarding the population will be used by the UK and Welsh Governments, Councils and all public services for the next decade in their service planning and resource allocations. These are decisions which affect everyone's lives, from determining housebuilding targets, agreeing school organisation and broader city planning issues.

During the Taskforce programme, we supported efforts to increase visibility and awareness around the Census 2021 and completion of this important survey by ethnic minority residents. This work was supported by a local team of ONS staff who conducted outreach to engage the city's Indian, Black African, Chinese and EU Roma communities to ensure they were accurately represented in the city's Census data.

When the 2021 Census data is published, we encourage local public services to reflect on what this data illustrates for our city's ethnic minority communities and that relevant analysis and key findings are made visible to all relevant staff and partner agencies.

# DATA ON ETHNIC DIVERSITY AND INEQUALITY

## Overall population: ethnicity data

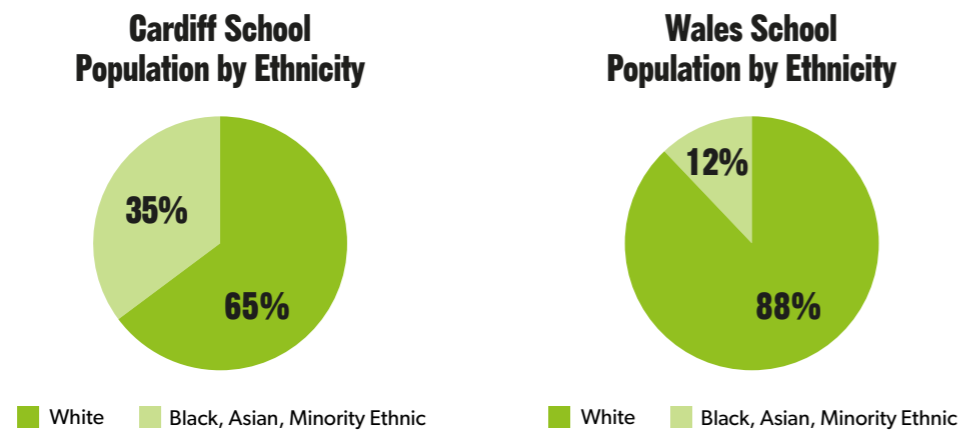


Using statistics from the Annual Population Survey, it is estimated that, for the year ending 31 June 2021, 76,700 of Cardiff's residents were from ethnic minority groups: 15.6% of the total population.

In comparison, 153,500 individuals are from ethnic minority groups in Wales as a whole: 4.9% of the total population. This suggests that half of Wales' ethnic minority citizens, live in the capital.

SOURCE: Stats Wales, Ethnicity by Area and Ethnic Group, Year ending 30 June 2021 [www.statswales.gov.wales/Catalogue/Equality-and-Diversity/Ethnicity/ethnicity-by-area-ethnicgroup](http://www.statswales.gov.wales/Catalogue/Equality-and-Diversity/Ethnicity/ethnicity-by-area-ethnicgroup)

## School population: ethnicity data

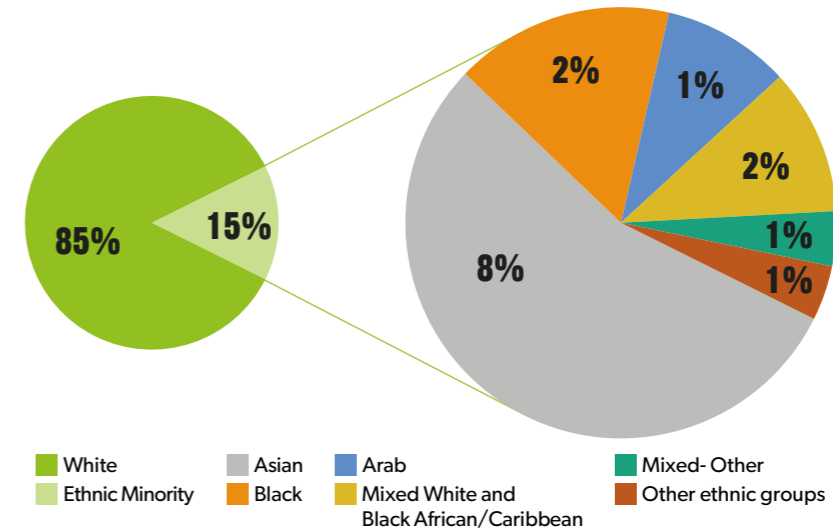


Data from the Pupil Level Annual School Census for 2020/21 indicates that 15,520 pupils in Cardiff aged 5 or over are from ethnic minority groups: 35.2% of the total school population, compared with 12.1% for Wales as a whole.

SOURCE: Pupil Level Annual School Census 2020/21, [www.statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census](http://www.statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census)

## Cardiff's Population: Data on ethnic groups

The most reliable data on the population size of each ethnic group at the time of this report's publication comes from the 2011 Census, which is currently out of date. This data does however provide some insight into the city's ethnicity profile and is included here to provide insight into the comparative sizes of different ethnic groups in the city and the diversity encapsulated by the term 'ethnic minority' which we have used throughout this report.



## Population by Country of Birth & Nationality: A comparison of Cardiff, Wales & the UK

### Population by Country of Birth:

	Population Estimate	UK Born		Non-UK	
		Estimate	%	Estimate	%
UK	66,329,000	56,689,000	85.5	9,614,000	14.5
Wales	3,120,000	2,932,000	94.0	188,000	6.0
Cardiff	373,000	322,000	86.3	51,000	13.7

### Population by Nationality:

	Population Estimate	British		Non-British Born	
		Estimate	%	Estimate	%
UK	66,329,000	60,287,000	90.9	6,013,000	9.1
Wales	3,120,000	2,994,000	96.0	126,000	4.0
Cardiff	373,000	336,000	90.1	37,000	9.9

Source: Population Estimates by Country of Birth (UK/Non-UK) for the period July 2020- June 2021, Office of National Statistics

## Ethnicity & Gender: A summary of key UK statistics on socioeconomic status

- In every ethnic group, a higher percentage of men than women were in 'higher managerial and professional occupations' (the highest socio-economic group); the biggest difference was in the Indian group, where 27% of men and 13% of women were in such occupations
- In nearly every ethnic group, a higher percentage of women than men were in the 'never worked or long-term unemployed' socio-economic group; the biggest difference was in the Pakistani and Bangladeshi ethnic groups, where women were nearly twice as likely as men to be in that socio-economic group
- 60% of women and 40% of men from the Arab ethnic group, and 51% from the Bangladeshi group, were classed as 'never worked or long term unemployed', the highest percentages for women out of all ethnic groups
- Men from the Pakistani ethnic group were most likely to be 'small employers and own account workers' (at 19%), and Mixed White and Black Caribbean men were least likely to be (at 5%)

**SOURCE: UK Government, Ethnicity Facts and Figures Portal, Work, Pay & Benefits, <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits>**

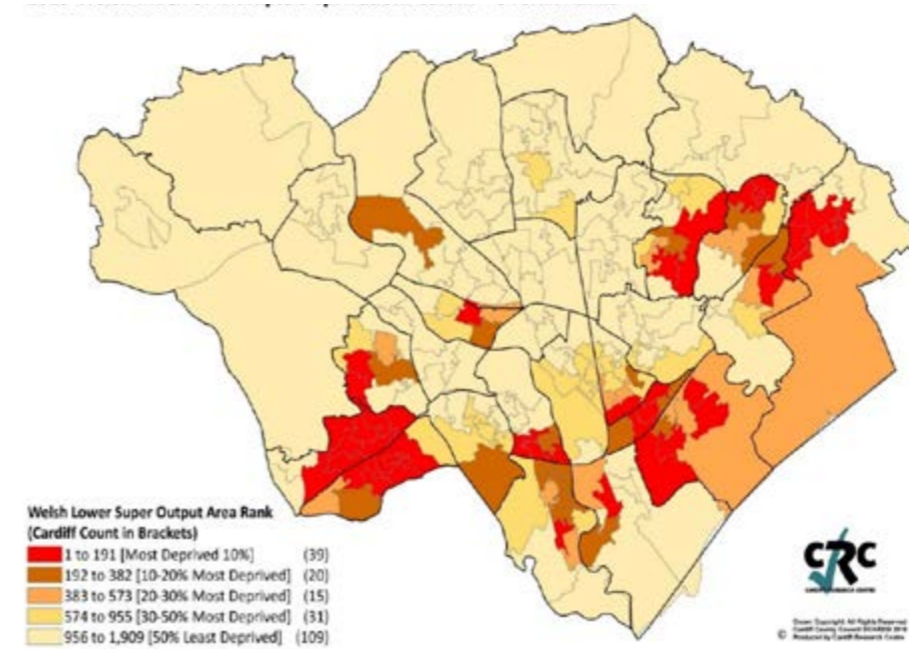


## Overall inequality: Welsh Index of Multiple Deprivation data

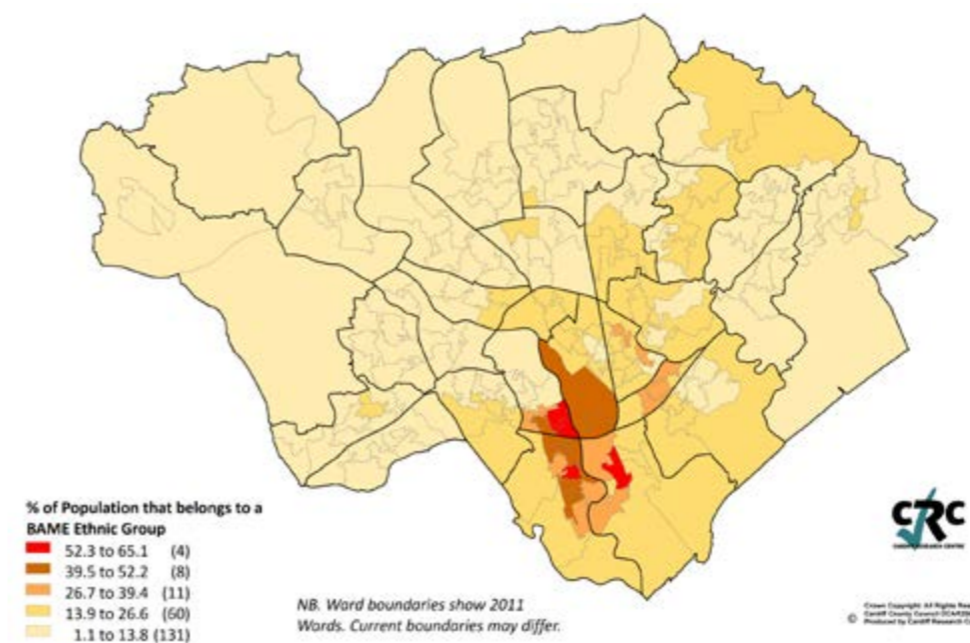
The Welsh Index of Multiple Deprivation (WIMD) is the Welsh Government's official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. WIMD ranks all small areas in Wales from 1 (most deprived) to 1,909 (least deprived).

The Welsh Index of Multiple Deprivation paints a complex picture for the city. However, in terms of overall deprivation, 34.8% of Cardiff's Black/African/Caribbean/Black British population reside in the top 10% most deprived areas of the city, this is twice the rate of the White ethnic group.

### 2019 Welsh Index of Multiple Deprivation: Cardiff - Overall Ranks



### Percentage of Total Population that Belongs to a BAME Ethnic Group by LSOA, 2011 Census



## Race Equality Taskforce: Priorities for change



In the following chapters of this report, we provide a summary of evidence regarding ethnicity within each theme, an outline of Cardiff's Race Equality Taskforce's general reflections for future local work within the thematic area and specific itemised recommendations developed by the Taskforce to support future action-planning and delivery.



# THEME 1: EMPLOYMENT AND REPRESENTATIVE WORKFORCE

## Employment and Representative Workforce

**NOTE:** Here we have primarily used the most recent UK-wide data due to limitations within local data sets, such as small sample sizes, and as the local Census 2011 data is now over 10 years old.

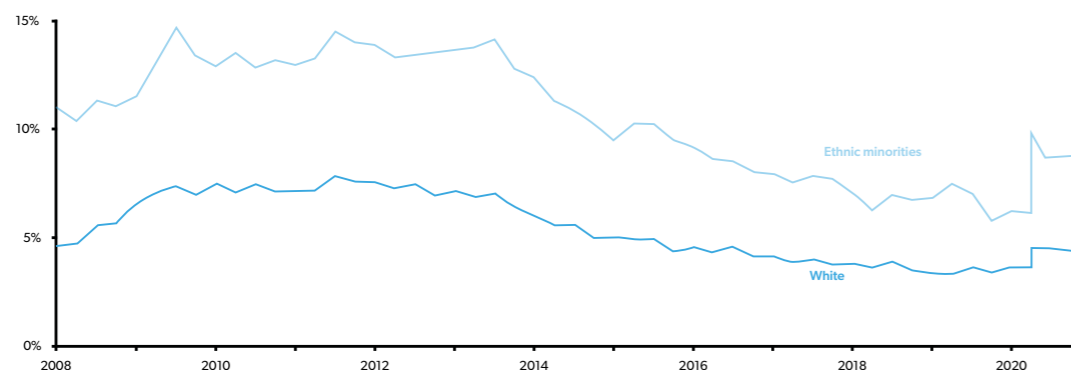
The Annual Population Survey 2019 data suggests that the unemployment rate for White and Ethnic Minority Groups is the same in Wales, at 4%, but this figure should be treated with caution in light of other UK statistics with larger sample sizes.

### Unemployment

In the twelve months to June 2021, the UK unemployment rate was highest for people from a Black (12%) ethnic background, and lowest for people from a White (4%) or Indian (5%) ethnic background.

#### Unemployment rate by ethnic background: UK, 2008-21

People aged 16+, not seasonally adjusted



This trend is even more pronounced amongst young people, with Black young people experiencing unemployment rates 3 times higher than their White peers.

#### Unemployment by age and ethnic background

July 2020 - June 2021, Thousands

	16-24		25-49		50+		Total (16+)	
	Level	Rate(%)	Level	Rate(%)	Level	Rate(%)	Level	Rate(%)
White	440	13%	500	3%	330	3%	1,270	4%
Black	40	36%	60	9%	30	8%	130	12%
Bangladeshi/ Pakistani	20	22%	30	7%	<10	10%	60	10%
Indian	<10	18%	30	5%	<10	4%	50	5%
Other ethnic backgrounds	60	26%	70	6%	20	7%	150	9%
<b>Minority ethnic background</b>	<b>130</b>	<b>26.4%</b>	<b>200</b>	<b>6.6%</b>	<b>70</b>	<b>7.1%</b>	<b>400</b>	<b>9.0%</b>
<b>Total</b>	<b>580</b>	<b>14.6%</b>	<b>700</b>	<b>3.7%</b>	<b>400</b>	<b>3.7%</b>	<b>1,670</b>	<b>5.7%</b>

Source:ONS Annual Population Survey microdata

Notes: All numbers rounded to nearest 10,000 and may not sum due to rounding. Estimates based on survey responses so subject to sampling error.

"Other ethnic backgrounds" includes people from Chinese, other Asian, mixed/multiple or other ethnic backgrounds.



The unemployment rate is lower for men from a minority ethnic background (8.3%) than for women (9.8%), but this varies across different ethnic minority groups.

#### Unemployment by ethnic background and sex: UK

July 2020 - June 2021, Thousands

	Male		Female		Total	
	Level	Rate(%)	Level	Rate(%)	Level	Rate(%)
White	740	4.8%	530	3.9%	1,270	4%
Black	50	10.4%	80	13.1%	130	12%
Bangladeshi/ Pakistani	30	8.1%	30	12.4%	60	10%
Indian	20	4.4%	30	6.6%	50	5%
Other ethnic backgrounds	90	9.7%	70	8.2%	150	9%
<b>Minority ethnic background</b>	<b>190</b>	<b>8.3%</b>	<b>210</b>	<b>9.8%</b>	<b>400</b>	<b>9%</b>
<b>Total</b>	<b>930</b>	<b>5.3%</b>	<b>740</b>	<b>4.6%</b>	<b>1,670</b>	<b>5%</b>

Source:ONS Annual Population Survey microdata

Notes: All numbers rounded to nearest 10,000 and may not sum due to rounding. Estimates based on survey responses so subject to sampling error.

"Other ethnic backgrounds" includes people from Chinese, other Asian, mixed/multiple or other ethnic backgrounds.

### The impact of Covid-19 on the labour market






Analysis produced to date suggests that workers who are from an ethnic minority background have been one of the groups most negatively impacted economically by the coronavirus pandemic.

Research has suggested that individuals from ethnic minority backgrounds were more likely to work in occupations with a higher risk of COVID-19 exposure, and 15% of workers in the sectors most affected by the pandemic were from an ethnic minority group, compared to 12% of all workers.<sup>1</sup>


<sup>1</sup>PHE, Beyond the data: Understanding the impact of COVID-19 on BAME groups, 16 June 2020, p5 Library analysis of the Labour Force Survey, 2019 Q4, using IFS definition of vulnerable sectors.

The most recently available Annual Population Survey Data indicates the following trends at a UK level:

## Employment by Occupation

	The combined Pakistani and Bangladeshi ethnic group had the lowest percentage of workers in 'professional' jobs (18.8%)
	10.3% of all workers were in 'elementary' jobs, occupations associated with lower socio-economic circumstances and the percentage of workers in 'elementary' jobs was highest in the Black (15.6%) and White Other (14.8%) ethnic groups
	38.1% of workers from the combined Pakistani and Bangladeshi ethnic group were in the 3 occupation groups with the lowest associated socio-economic circumstances, but this is down from 44.5% in 2009
	17.1% of Black workers were in 'caring, leisure and other services' jobs, the highest percentage out of all ethnic groups
	The percentage of workers in 'manager, director or senior official' jobs – the type of occupations associated with higher socio-economic circumstances – was highest in the Indian (12.2%) and White British (11.7%) ethnic groups, and lowest in the Black ethnic group (5.4%) <sup>2</sup>

## The UK Ethnicity Pay Gap

	<p>In 2019, employees from the Indian ethnic group had the highest average hourly pay out of all ethnic groups (£14.43) &amp; employees from the combined Pakistani and Bangladeshi ethnic group had the lowest (£10.55)</p> <ul style="list-style-type: none"> <li>• Employees from the Indian ethnic group had the highest hourly pay every year from 2013 to 2019</li> <li>• Employees from the combined Pakistani and Bangladeshi ethnic group had the lowest hourly pay every year</li> <li>• The average hourly pay for White employees was £12.21</li> </ul>
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<sup>2</sup> Employment by occupation - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)

## Council workforce ethnicity by grade

The table below shows that ethnic minority staff currently constitute 10.26% of the workforce at Cardiff Council as of March 2021. This is an increase from 9.87% in 2020.

For staff who have disclosed their ethnicity there was a 4.79% increase of employees from the Black, Asian and Minority Ethnic in Cardiff Council's workforce in 2021 compared to 2020, however there remains a data gap with nearly 1,000 staff not having disclosed their ethnicity, reporting of which remains optional for staff.

Ethnic Group	Employees		2011 Census %	
	%	No.	Cardiff	Wales
Asian	2.86%	356	8.00%	2.20%
Black	1.98%	247	2.40%	0.60%
Chinese / Far East	0.36%	45	1.20%	0.40%
Mixed Ethnicity	2.01%	250	2.90%	1.00%
Other	0.35%	43	2.00%	0.50%
White Gypsy/Traveller	0.01%	1	0.20%	0.10%
White Irish	0.53%	66	0.70%	0.50%
White Other	0.71%	88	3.50%	1.80%
White European	1.46%	182		
White British *	89.74%	11175	80.00%	93.20%



## Council workforce ethnicity data by grade

The table below displays by ethnic group the grading of the Council's employees permanent/temporary workforce (almost all employees excluding teachers and those in school settings who are not part of the Council's collective agreement) who have been graded in accordance with the Council's Job Evaluation scheme. Grade 1 is the lowest paid grade, and OM+ group (includes Operational Managers, Assistant Directors, and Directors).

Ethnic Group	GRADE														SCHOOL LEADERSHIP SCALE	TEACHER UPPER PAY SCALE	TEACHER MAIN PAY SCALE	UNQUALIFIED TEACHER
	GRADE 01	GRADE 02	GRADE 03	GRADE 04	GRADE 05	GRADE 06	GRADE 07	GRADE 08	GRADE 09	GRADE 10	OM+	JNC Y&C	SOULBURY'	OTHER				
Asian	29	81	73	49	32	27	13	7	2	3	4	4	1	0	0	17	13	1
Black	34	22	45	36	28	20	19	10	3	3	0	10	1	0	0	10	4	2
Chinese / Far East	2	10	7	9	6	2	4	3	1	0	0	0	0	0	0	0	0	1
Mixed Ethnicity	19	11	40	44	43	31	25	8	2	2	1	5	2	0	0	11	6	0
Other	4	4	12	5	5	1	2	1	0	0	0	1	0	0	0	6	2	0
White British	338	559	1395	1604	1660	996	669	426	168	163	98	100	36	34	336	1822	750	21
White European	20	12	41	28	25	16	5	4	2	0	0	2	1	1	1	11	13	0
White Gypsy/Traveller	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
White Irish	0	1	8	7	6	4	4	4	3	0	1	2	1	1	5	12	7	0
White Other	5	8	11	7	15	10	7	5	1	1	2	1	1	0	0	9	4	1
<b>Total</b>	<b>451</b>	<b>708</b>	<b>1633</b>	<b>1789</b>	<b>1820</b>	<b>1107</b>	<b>748</b>	<b>468</b>	<b>182</b>	<b>172</b>	<b>106</b>	<b>125</b>	<b>43</b>	<b>36</b>	<b>342</b>	<b>1898</b>	<b>799</b>	<b>26</b>

Ethnic Group	GRADE														SCHOOL LEADERSHIP SCALE	TEACHER UPPER PAY SCALE	TEACHER MAIN PAY SCALE	UNQUALIFIED TEACHER
	GRADE 01	GRADE 02	GRADE 03	GRADE 04	GRADE 05	GRADE 06	GRADE 07	GRADE 08	GRADE 09	GRADE 10	OM+	JNC Y&C	SOULBURY'	OTHER				
Asian	6.43%	11.44%	4.47%	2.74%	1.76%	2.44%	1.74%	1.50%	1.10%	1.74%	3.77%	3.20%	2.33%	0.00%	0.00%	0.90%	1.63%	3.85%
Black	7.54%	3.11%	2.76%	2.01%	1.54%	1.81%	2.54%	2.14%	1.65%	1.74%	0.00%	8.00%	2.33%	0.00%	0.00%	0.53%	0.50%	7.69%
Chinese / Far East	0.44%	1.41%	0.43%	0.50%	0.33%	0.18%	0.53%	0.64%	0.55%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.85%
Mixed Ethnicity	4.21%	1.55%	2.45%	2.46%	2.36%	2.80%	3.34%	1.71%	1.10%	1.16%	0.94%	4.00%	4.65%	0.00%	0.00%	0.58%	0.75%	0.00%
Other	0.89%	0.56%	0.73%	0.28%	0.27%	0.09%	0.27%	0.21%	0.00%	0.00%	0.00%	0.80%	0.00%	0.00%	0.00%	0.32%	0.25%	0.00%
White British	74.94%	78.95%	85.43%	89.66%	91.21%	89.97%	89.44%	91.03%	92.31%	94.77%	92.45%	80.00%	83.72%	94.44%	98.25%	96.00%	93.87%	80.77%
White European	4.43%	1.69%	2.51%	1.57%	1.37%	1.45%	0.67%	0.85%	1.10%	0.00%	0.00%	1.60%	2.33%	2.78%	0.29%	0.58%	1.63%	0.00%
White Gypsy/Traveller	0.00%	0.00%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
White Irish	0.00%	0.14%	0.49%	0.39%	0.33%	0.36%	0.53%	0.85%	1.65%	0.00%	0.94%	1.60%	2.33%	2.78%	1.46%	0.63%	0.88%	0.00%
White Other	1.11%	1.13%	0.67%	0.39%	0.82%	0.90%	0.94%	1.07%	0.55%	0.58%	1.89%	0.80%	2.33%	0.00%	0.00%	0.47%	0.50%	3.85%



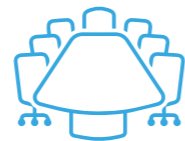
## A vision for the future city workforce

Despite considerable improvements in educational attainment among ethnic minority groups at a UK-wide level, particularly for Black African and Bangladeshi students, the data illustrates that this has not been matched by sustained progress in the labour market. The fact that improving educational attainment has not translated into better labour market outcomes suggests that the heart of the challenge is the transition from education into work. Yet, while much of the policy focus for labour market inequalities has been on the options for the UK and Welsh Governments, there is also a strong case for doing more at the local level.

Local efforts for supporting ethnic minority education-to-work transitions and addressing labour market underrepresentation have three key advantages over national efforts: they are more accountable, are better informed by local demographics, and they are more sensitive to local employers.

The Taskforce's Employment and Representative Workforce recommendations comprise three overarching approaches:

- **Encouraging employers in the city to recruit a more diverse workforce, including leading activity to diversify the Council workforce itself (demand side)**
- **Working with employers and ethnic minority residents to broker employment opportunities (co-ordination)**
- **Providing tailored support to ethnic minority staff, residents, and young people (supply side)**



Local authorities in particular can play an important role, because they can act as coordinators, joining up the work being done by key institutions in the local economy and community, including Into-Work Services, Economic Development, Job Centre Plus, local businesses, community groups, and schools and universities.

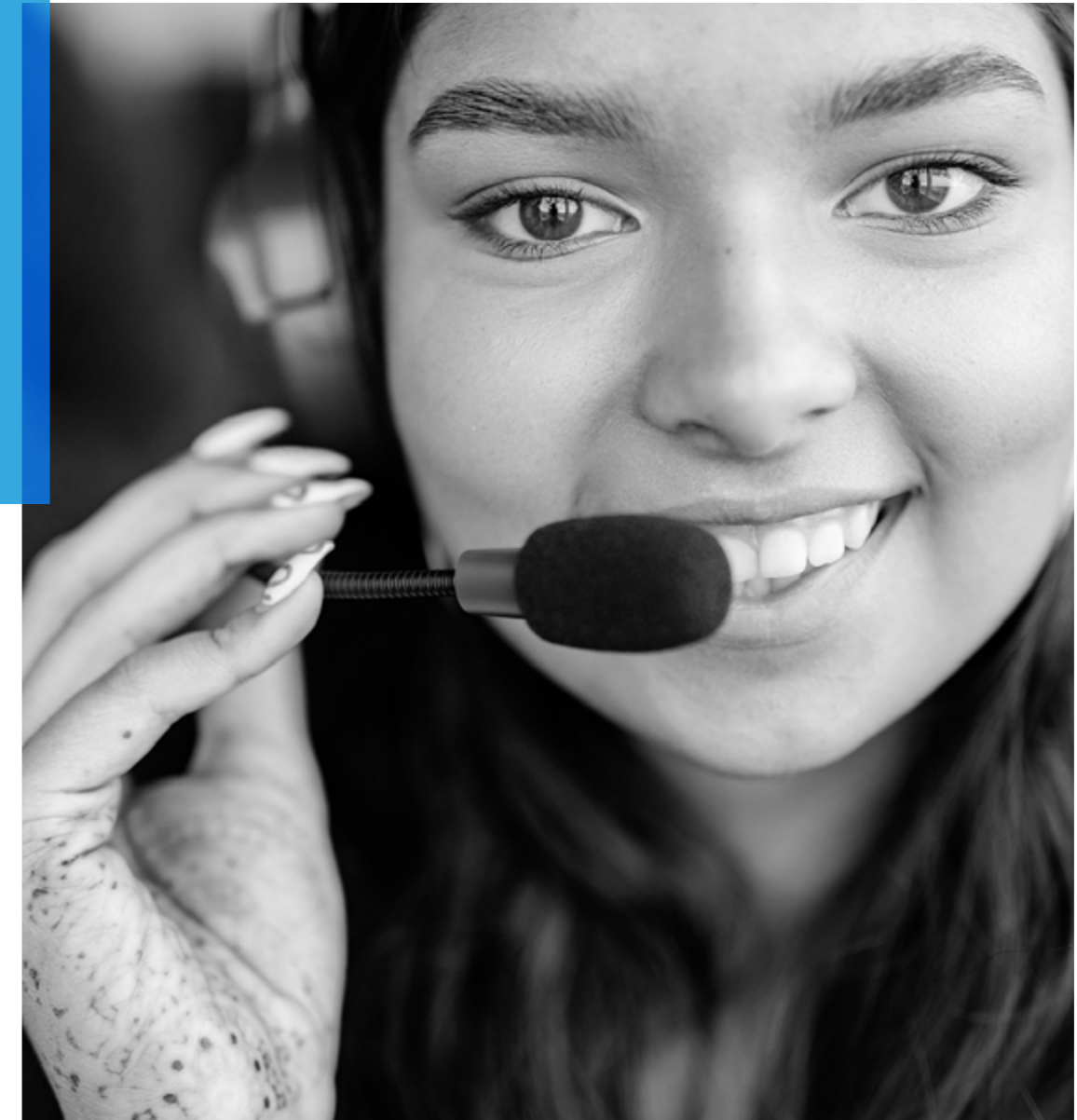
Cardiff Council is therefore in a strong position to take a bolder approach to tackling local ethnic disadvantage in the city labour market and the Taskforce encourages the setting of ambitious goals to ensure that levels of employment reflect the ethnic composition of the local area. With the twin challenges of unemployment and over-qualification, activity to support both entry to the labour market and labour market progression are required.

Across all three areas, the local authority performs a dual role, as both a convener of local labour market activity and job creation, and as a major employer in the city who can set high standards for itself as a central institution and lead by example through intentional action.

The Taskforce supports the incorporation of ethnic minority specific targets into mainstream efforts to tackle youth unemployment and promote economic regeneration in the city, recognising the work delivered to date at a city level which focuses on addressing socioeconomic disadvantage

and building a fairer city economy, including the Cardiff Commitment Programme and delivery of apprenticeship schemes such as Kickstart.

Whilst such schemes have delivered demonstrable outcomes to widen opportunity to socioeconomically disadvantaged groups in the city, renewed focus on beneficiary ethnicity data will help to ensure these major programmes are reaching ethnic minority groups who are currently underrepresented in the labour market and inform further targeted activity.



Action in this area will contribute to the local delivery and achievement of the Socioeconomic Duty, commenced in Wales in 2021. This requires that public authorities demonstrate that their policies are best designed to achieve equality and a higher level of enjoyment of economic and social rights for everyone, especially for the most disadvantaged groups. This is not only a matter of equality and human rights, but it is also about transparency, promoting an open society and public services and evidence-based policymaking.

The Taskforce's recommendations across this theme together constitute a locally attuned blueprint to prioritise action which addresses ethnic inequalities in the labour market and aligns this with the Council's local economic

development plans and established programmes of work to reduce unemployment and socioeconomic inequality in the city.

Our recommendations include utilising existing connector programmes such as the IntoWork service and Cardiff Works agency to support labour market entry, focusing the brokerage role of the Council in local economic development to deliver increased labour market opportunities for underrepresented ethnic groups, and using procurement and city development and investment measures as a mechanism to embed ambitious labour market targets in all future major work programmes.

# EMPLOYMENT AND REPRESENTATIVE WORKFORCE: OUR RECOMMENDATIONS

## Encouraging employers in the city to recruit a more diverse workforce, including leading activity to diversify the Council workforce itself

Our recommendations in this area encompass both internally focused and partnership recommendations to support the delivery of increased labour market opportunities for ethnic minority Cardiffians. The moral case to do so is clear, but there also a clear economic case for the Council and its partners to adopt these approaches as part of a wider strategy to support growth, boost productivity and increase graduate retention in the city.

The Council has already adopted some organisational best practice approaches to improve ethnic diversity in its workforce. In publishing data about its own workforce and ethnicity pay gap, the Council has provided transparency and accountability for future delivery and this practice has been supported by a

comprehensive reform in recruitment practices to minimise the impact of unconscious bias during candidate shortlisting. There are also visible pockets of targeted recruitment activity from some services.

Looking forwards, the Council should look to develop a more comprehensive organisational and partnership framework to support employer action on underrepresentation at a city level. This will step-up collective efforts and transition the current piecemeal approach of individual agencies into a more impactful era of change delivery on ethnic inequalities. These efforts, where designed in partnership with education and training providers, may also provide much-needed solutions to public-sector workforce challenges in areas such as social care, teaching and nursing.



## 1.1

### RECOMMENDATION:



## Develop a city-wide network for employers to encourage good practice and collaboration on employment action to improve ethnic minority representation and progression in the local labour market

### IN DEPTH:

Across Cardiff, the Taskforce heard of many employers seeking to improve workforce diversity and of both emergent and established practice to attract and retain ethnic minority staff into organisations.

Whilst the willingness to achieve an ethnically representative workforce was widespread across major employers, there is a clear opportunity to strengthen local coordination and collaboration on labour market entry and progression for ethnic minority residents and workers in the city.

Creating an appropriate city forum or mechanism for cooperation, local ownership and delivery on equality will support increased action on labour market inequalities, promote accountability and the extend the reach of existing and effective city-wide employment schemes, including apprenticeships and graduate programmes.

This network of local actors could be framed as a city charter or pledge, to raise visibility and awareness of collective action to improve equality at a city level. This would follow a good practice model the Taskforce observed from Bristol City Council, through the Bristol Equality Charter and Network.

This approach has the potential to be particularly effective where employers are equipped with relevant data and insights on labour market representation to target their recruitment and retention approaches through a collaborative and supportive local network.

Local organisations throughout the public, private and voluntary sectors are anchored in Cardiff's labour market realities and their knowledge is a valuable resource in addressing labour market inequalities.

A forum for collaboration would support the coordination of a shared approach to address ethnic inequalities in employment within the city, delivering greater cumulative impact than where each institution acts alone.

A city-wide network could also support the coordination and delivery of relevant employer-focused training, best practice exchange and collaboration between educational institutions and city employers to support education to work transitions.

# 1.2

## RECOMMENDATION:



Become a signatory to the Cardiff Community Jobs Compact

### IN DEPTH:

The Cardiff Community Jobs Compact is an award-winning initiative to encourage businesses in Cardiff to provide more employment opportunities to local people.

The Community Jobs Compact was established in 2017 by a community action group in Butetown supported by Citizen's Cymru. The Compact was introduced in response to findings that many residents, especially those well skilled and with a degree, struggled to secure local employment and particularly employment commensurate with their educational attainment.

The Taskforce supports this initiative because it responds to two categories of challenge faced by ethnic minority residents, and particularly young ethnic minority people in the city: unemployment and underemployment. The former is a particular challenge for ethnic minority school leavers with lower levels of education; the latter is a particular challenge for ethnic minority employees with higher levels of education

Employers who sign up to the scheme are supported by Citizen's Cymru Wales who, as part of the Compact, promote job opportunities in the local community and provide application support and interview coaching to local people.

The Jobs Compact includes the following employer requirements, each of which Cardiff Council had already adopted as organisational policy but not all have not been widely publicised.

The signing of the Jobs Compact as a major employer and place-making institution for the city sends a clear message regarding the Council's commitment to action and encourages further adoption of these standards across employers in the city, delivering aggregate impact:

- Be accredited as a 'Living Wage for Wales' employer;
- Paying all staff and contractors at least £9.90 an hour from 1st April 2022;
- Recruit using name-blind and address-blind CVs and/or guarantee an interview to local residents who meet the criteria;
- Introduce unconscious bias training for interviewers;
- Ensure all staff have the option of a minimum hour's contract and;
- Demonstrate opportunities for growth and development.

# 1.3

## RECOMMENDATION:



Use planning and commissioning powers to require employers to recruit apprenticeships from disadvantaged groups and to increase transparency about the diversity of their workforces

### IN DEPTH:

Public authorities often choose to work in contractual partnerships with the private and voluntary sector for the provision of a wide range of services, infrastructure and goods. In these cases, effective procurement can help to improve service quality, including better meeting the diverse needs of different ethnic groups.

In addition to improving quality-of-service, public sector purchasing power can be used by public authorities as a way to advance equality and, where appropriate, achieve wider social benefits, such as creating training or employment opportunities for local people.

Major economic development, housebuilding and regeneration deals can offer a robust framework to incentivise and require contractors to create local jobs, prioritising communities with the highest levels of unemployment and socioeconomic disadvantage. This can be an effective mechanism for the delivery of race equality goals, particularly where this is underpinned by a broader partnership with local employment and training agencies.

Achieving race equality through procurement requires skill from public authorities and their partners. It also requires both partners to share a public service ethos and see the importance of socially inclusive wealth creation. Whilst this should be adopted as a broad approach to maximising the social value of public spend, in particular, the Taskforce recommends the implementation

of a robust measurement and accountability framework for the major Arena development and broader investment in Atlantic Wharf. This development is significant in the context of location in Butetown and its proximity to Grangetown and Riverside, the most ethnically diverse wards in the city, and the location of some of Cardiff's most socioeconomically-deprived neighbourhoods.

#### Spotlight on: Atlantic Wharf Redevelopment

A 15,000 capacity Cardiff Arena will be built in Cardiff Bay as part of Cardiff Council's redevelopment of Atlantic Wharf.

The development will include retail and leisure facilities, hotels, a multi-storey car-park and new homes. The arena will be positioned at the heart of a new cultural area incorporating the Wales Millennium Centre production space, potentially a National Art Gallery, and a 'This is Wales' fly-through visitor attraction. A consortium led by US entertainment company Live Nation has been selected as the preferred bidder to deliver a new 15,000-capacity indoor arena in Cardiff Bay that aims to become the "premier arena" in the southwest region of England and Wales.

The planned new venue will cost around £150m to build and is projected to attract more than one million visitors and inject an estimated £100m into the local economy every year.

# 1.4

## RECOMMENDATION:



Support an inclusive and engaged workforce where all staff understand and contribute to race equality action through awareness-raising internal programming

## IN DEPTH:

The Taskforce learned of ongoing collaboration between the Council’s HR department and the Black, Asian and Minority Ethnic Employee Network, which has included an internally focused action plan created by staff within the Network and the support of a senior management sponsor, the Council’s Chief Executive.

The Council’s commitment to capture staff ethnicity data and make this data available for scrutiny, alongside the organisation’s ethnicity pay gap, also demonstrates a practical and meaningful approach to understanding and addressing the barriers ethnic minority residents may face in recruitment and progression within the organisation and ensuring that the organisation takes continuous steps to become more representative of the diverse city it serves.

The Black Asian and Ethnic Minority Staff Network reflected that there were opportunities to raise the profile of the internal staff Network’s presence and priorities, and to invite a wider range of staff from across the organisation to engage in race equality conversations and initiatives.

The Taskforce recognised that, while it can be difficult and uncomfortable to discuss issues of race, it’s important that the conversations continue to take place and that staff of all ethnic backgrounds understand the role that they can play in supporting race equality at work and in service delivery.

Being guided by the existing Chair and membership of the Council’s Black, Asian and Ethnic Minority Staff Network, the Taskforce supports the Network’s proposal to develop a range of resources and implement additional awareness-raising programming for Council staff, including additional training relevant to contemporary race equality issues. This work should be supported by the Council’s HR and Equality Teams, to ensure all staff feel supported and confident to engage in shared conversations about the organisation’s equality approach, with relevant issues including recruitment, workforce development and fostering an inclusive culture which demonstrates understanding of equality issues and intent on advancing equality in all aspects of business.

It is positive that this work has been supported to date by the Council’s Chief Executive, and the Taskforce encourage the continuation of senior management sponsorship for the Network as they progress their new direction and seek to raise the profile of race equality issues within the workplace.



## Working with employers and ethnic minority residents to broker employment opportunities

These recommendations recognise the importance of partnership work between the local authority and education providers, local employers, and employment service providers in improving ethnic minority representation in the local labour market.

Local strategies to broker employment opportunities for ethnic minority residents can form part of a broader approach and action can be effectively mainstreamed into existing services. The approach should however demonstrate understanding and sensitivity to issues of underrepresentation and specific barriers which ethnic minority residents may face in the labour market. This area of work should focus both on major employers and local small and medium-sized enterprises (SMEs) who often do not have

the capacity to manage the administration of work placements but can contribute to city-wide efforts to increase labour market opportunities for ethnic minority residents.

In addition to the recommendations outlined below, the Taskforce also supports future exploration of graduate employment routes and encourages further collaboration between the Council and Universities in the city to deliver new pathways for ethnic minority graduates as they make the transition from university to work. There was a strong appetite to progress this across city institutions and this could be progressed in the context of the city network described in Recommendation 1.1.

# 1.5

## RECOMMENDATION:



### Increase participation of ethnic minority groups in the Into Work Advice Service

#### IN DEPTH:

Cardiff Council’s IntoWork Advice Service is a coordination and brokerage service which matches job seekers with relevant training, upskilling opportunities, career advice and matches residents with local labour market opportunities.

The service is well established, reaching approximately 50,000 residents each year, and successfully placing between 800-1000 job seekers into new roles each year.

The IntoWork service operates across Hubs and Libraries in the city, making it an accessible neighbourhood service for residents across the city. Several Hubs are already established in parts of the city with the greatest ethnic diversity, such as Butetown, Grangetown, Central Library (covering Cathays, Riverside and Plasnewydd) and the STAR Hub (covering Adamsdown and Splott).

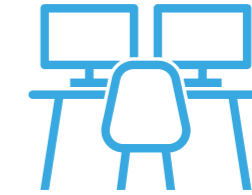
Research from TUC found that the unemployment rate for ethnic minority groups has risen at more than twice the speed of the unemployment rate for White people during the pandemic. With Black, Asian and Ethnic Minority workers feeling the economic impact of the pandemic more acutely, widening participation of ethnic minority residents in the IntoWork service is a timely and worthwhile approach in Cardiff’s pandemic recovery response and will contribute to the city’s broader race equality goals.

This work could include both awareness raising programming and increasing staff capacity within parts of the service which serve the city’s ethnically diverse wards and should be transparent in documenting future work to extend the service’s reach, impact and outcomes in supporting ethnic minority job seekers in the city.



# 1.6

## RECOMMENDATION:



### Improve access to and visibility of Cardiff Works for ethnic minority groups

#### IN DEPTH:

Cardiff Works is Cardiff Council’s internal temporary staffing service and provides an important platform for job seekers to access Council roles, acting as an entry route for public sector careers.

The Taskforce supports renewed efforts and activity to raise awareness of the service amongst ethnic minority groups, who are currently underrepresented in the Council workforce, recognising that this service could present an accessible gateway to the wide variety of career pathways available within local government and the wider public sector.

Delivery against this recommendation will not only contribute to the Council’s representative workforce ambitions but will also ensure a supply of new talent into service areas which have experienced recruitment shortages, including social care.

In delivering this recommendation, the Council should consider how to raise awareness of the Cardiff Works service, as we heard that this is not currently particularly visible to residents and job seekers from ethnic minority backgrounds and consider how promotional activity could effectively reach ethnic minority residents through collaboration with community institutions and schools.

### Providing tailored support to ethnic minority staff, residents, and young people

Unemployment differences and the pay gap between ethnic groups have been declining, though remain significantly higher for ethnic minority young people.<sup>3</sup>

Whilst the overall trend is positive, there is an opportunity for the Council and its partners to refocus thinking on particular ‘challenge areas’ where underrepresentation, underemployment and unemployment persist for particular ethnic minority groups. This recognises that we cannot treat ethnic minorities as one single group with the same obstacles and a more nuanced approach can also

demonstrate consideration of the additional barriers which present for ethnic minority women and young people.

The publication of the latest Census data for 2021, expected later this year, will provide great insight into local city employment trends by ethnicity and other demographic factors, giving critical insight into future priorities for targeted work. To inform future strategy, the Council should ensure this data is visible and understood internally and across its partnerships so it can be used effectively in future policy development at a city level.

<sup>3</sup> Ethnicity Facts and Figures, (2021) Unemployment by ethnicity. Covers England, Scotland and Wales in the year 2019. Source: Annual population survey. Available at: [www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest](http://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest)

# 1.7

## RECOMMENDATION:



### Support career progression routes for ethnic minority employees at Cardiff Council

#### IN DEPTH:

Many talented ethnic minority staff are motivated to join the Council workforce out of a desire to serve their community, bringing incredible experience and skills to the Council and delivering huge benefits to city residents. Ethnic minority groups are however currently underrepresented in the Council workforce as a whole, and particularly in the two upper quartiles of Council roles.

It is recognised that, as with other parts of the public sector, a decade of austerity has impacted the Council’s ability to attract new talent into the organisation due to prolonged freezes on external recruitment. This has stalled progress on achieving the Council’s ambition to achieve a representative management team and within this context, a new intentional approach is required to develop a pipeline of management talent for the future.

The Taskforce recommends that the Council refocus its efforts to boost representation at senior grades (OM+) and feeder grades (8-10) in particular, through a carefully designed package of development and mentorship support for ethnic minority staff. Such schemes have begun to bear fruit and create positive change in other parts of the UK’s public sector and can provide a design template for ‘what works’ within the reality of a large and complex organisation.

Such a programme could incorporate elements such as leadership and management training, mentorship and reverse mentorship and provide opportunities to meet and engage with the existing senior management team and ethnic minority role

models from senior levels both within and external to the Council. This work can be supplemented by other recommendations in this report which will help to increase ethnic minority entrants to the Council workforce at all grades and further strengthened through alignment with broader workforce planning measures and organisational development programmes.

The Council is at its best when it reflects the diversity of the city as a whole and is able to understand what the public needs. Whilst many positive steps have already been made to increase transparency in workforce and pay data, support the work of the Black, Asian and Ethnic Minority Staff Network and refresh recruitment practices to minimise bias in shortlisting and selection, the Council can and should be ambitious in taking further positive action towards its diversity objectives.

Correcting the underrepresentation of ethnic minority groups within mid and senior Council roles will require a proactive and determined approach with buy-in from the existing management team and adequate resources to support ongoing diversity and inclusion initiatives. It is accepted that this change will not be an immediate one, the journey to achieve a representative staff body will almost certainly be a multi-year journey, but this should not diminish long-term focus on progress and the visibility of the organisation’s diversity aspirations.

# 1.8

## RECOMMENDATION:



### Cardiff Council should explore employer led ESOL (English for Speakers of other languages) for Council staff where their language skills are a barrier to progression

#### IN DEPTH:

Whilst Cardiff’s migration data indicates wide variety in the qualifications, employment status, earnings and language skills of the city’s migrant communities, the Taskforce were keen to reflect on what more could be done to support those with lower levels of English and deliver improvements in their employment outcomes.

This recommendation therefore focuses on non-UK born residents of Cardiff who aspire to achieve higher and conversational levels of English which would enable them to access higher-paying and more secure work, focusing initially on Council staff. This is a cohort of residents who are working to earn an income and support their families, but desire to learn English if their personal circumstances allow.

Multiple strategies are needed to address barriers to participation in ESOL learning, and the Council could support additional workplace delivery to enable ethnic minority staff access ESOL where they wish to do so. This would contribute to their wellbeing, participation and future career progression both within the organisation and the broader city labour market.

A pilot programme which tests an integrated approach to ESOL provision within the Council workforce context could improve employment and progression outcomes for migrant workers within the Council, with particular benefits for staff with refugee backgrounds who use English as a second or additional language. This approach would enable the Council to develop new support and development routes for staff where language skills are currently a

barrier to the achievement of their career aspirations.

Whilst there are complex barriers to the delivery of a comprehensive integrated ESOL model in an employment context due to existing UK-level frameworks, the Council is encouraged to test new approaches and examine the ‘art of the possible’ in supporting the aspirations of this section of its workforce. This will deliver benefits to both individual staff and the organisation in improving representation throughout all levels of its workforce.

As a starting point, Cardiff benefits from a comprehensive ESOL (English for Speakers of Other Languages) Hub coordinated by Cardiff and Vale College and their industry-leading Reach programme, who could offer new solutions and opportunities to address current barriers.

#### Spotlight on REACH ESOL Hub

Cardiff’s REACH+ centre provides one central point of contact for anyone wishing to access ESOL in the city, based at Cardiff and Vale College. The model is recognised as industry leading as ESOL provision is centrally coordinated and ensures high quality assessment and progression onto the appropriate course and support quickly and easily. This service is a unique asset to support ESOL learners in Wales and also provides wider support services to refugees through the ReStart programme and offers employment-focused ESOL to fast-track ESOL learners to the labour market.

Find out more at <https://reach.wales/en/about>

# THEME 2: EDUCATION & YOUNG PEOPLE

## Education & Young People Data Insights

### Educational Attainment

Historically, ethnic minority pupils experienced disadvantage in terms of education and there was an attainment gap at a UK-wide level between ethnic minority groups and White British children.

Data from the 2011 Census demonstrated that this trend no longer applies, and the attainment of ethnic minority pupils has converged, and for some ethnic groups, exceeded national averages.

The picture of educational achievement across ethnic groups is complex, and different social, economic and cultural factors contribute to this: parental income levels, parental career and educational achievement, geography and family structure, amongst others.

What is clear, however, is that strong early-years support, good schools and evidence-based interventions can also improve educational outcomes across all groups and partly overcome other factors. The near closure of the ethnic attainment gap in the city is therefore testament to quality public services and school leadership and deserves recognition in our report.

Due to the Covid-19 Pandemic and curriculum changes in Wales, the mostly available recent pupil attainment data covers the 2018-2019 period. We include this here as an illustration of local attainment trends, which reflect those of broader UK data, but is limited in that it does not reflect the Covid-19 landscape or new school performance measures in Wales:

### Education: Foundation Phase to Key Stage 3 (2018/19)

	Any Other Ethnic Background	Asian	Black	Chinese	Mixed	White	Cardiff Average
Foundation Phase 2018/19	76.8%	82.9%	81.1%	90.2%	84.3%	84.3%	83.5%
Key Stage 2 2018/19	84.2%	88%	88.5%	100%	90.1%	88.5%	88.4%
Key Stage 3 2018/19	85.9%	90.3%	86.7%	100%	86.5%	84.8%	85.6%

Explainer: KS3 data is for year 2 (FP), year 6 (KS2) and year 9 (KS3) teacher assessment. The % is the proportion of learners achieving the expected outcomes in the FP areas of learning and core subjects at KS2 and KS3.

### Education: Key Stage 4 (2018/19)

	Any Other Ethnic Background	Asian	Black	Chinese	Mixed	White	Cardiff Average
KS4 Capped Points 2018/19	404.0	404.6	376.5	426.1	378.5	378.3	369.33
KS4 Literacy 2018/19	42.0	43.3	41.1	45.0	41.5	41.4	40.5
KS4 Numeracy 2018/19	41.8	42.2	37.0	48.0	38.1	39.0	38.2
KS4 Science 2018/19	41.5	42.6	36.3	44.0	37.7	38.6	37.4
KS4 Skills Challenge Certificate 2018/19	41.4	42.6	39.7	49.0	37.5	37.3	36.7

Explainer: Capped Points are the overall/combined results at KS4 (GCSE Yr 10/11), with the rest being a breakdown of separate subject areas within KS4.

Despite significant progress on levelling educational attainment, it is clear from earlier data in this report that ethnic minorities continue to face barriers to upward social mobility. We have outlined several city-level recommendations in the Employment and Representative Workforce chapter of this report which will help to address this.

### Experiences within the education system

A recent report from Show Racism the Red Card documented concerning evidence from pupils, parents and teaching staff in Wales on the prevalence of race-related bullying and prejudice at school.

**44%**

OF RESPONDENTS IN WALES WERE AWARE OF A CHILD BEING BULLIED DUE TO THEIR ETHNICITY, RELIGION OR NATIONALITY.

**25%**

OF TEACHERS HAD OBSERVED OR RESPONDED TO AN INCIDENT OF RACIAL DISCRIMINATION IN THE LAST 12 MONTHS.

### Diversity and representation in the city's education workforce

**1.5%**

OF TEACHERS IN CARDIFF ARE FROM AN ETHNIC MINORITY BACKGROUND

**35.2%**

OF YOUNG PEOPLE ARE FROM AN ETHNIC MINORITY BACKGROUND IN CARDIFF

**91.6%**

OF REGISTERED TEACHERS NATIONALLY IDENTIFIED AS WHITE.

**1.3%**

OF TEACHERS REGISTERED WITH THE EDUCATION WORKFORCE COUNCIL IN WALES IDENTIFIED AS BLACK, ASIAN OR FROM A MINORITY ETHNIC BACKGROUND, COMPARED WITH 5.2% OF THE ECONOMICALLY ACTIVE POPULATION.

**3.7%**

OF STUDENTS WHO BEGAN TRAINING TO BECOME TEACHERS IN WALES IN 2018-19 SAID THEY WERE FROM A MINORITY ETHNIC GROUP.

## Black History and the new curriculum for Wales

The new Curriculum framework for Wales is due to be introduced from September 2022.

Wales is the first nation of the UK to introduce mandatory learning about the diversity of communities, in particular the stories of Black, Asian and Minority Ethnic people, in the national curriculum.

Young Cardiffians have led campaign efforts for Black history to be included in the curriculum and spoke directly to Members of the Senedd about the significance of this change for future generations in Wales.

As a Taskforce, we welcomed this momentous decision and ambitious vision for inclusive education in Wales. We celebrate and acknowledge the efforts of our city's young people in driving this change.



**IF WE WANT A SOCIETY WHICH IS BETTER FOR ALL, WHERE THERE'S EQUALITY, AND THERE'S FAIR REPRESENTATION THEN WE NEED THIS. IT'S MASSIVE IN TERMS OF SHAPING WHO YOUNG PEOPLE ARE GOING TO BE IN THE FUTURE WHETHER THAT'S A POLICE OFFICER, A TEACHER, A POLITICIAN.**



Angel Ezeadum, a member of the UK youth parliament for Cardiff, speaking to the Senedd about Black history in the curriculum.



## EDUCATION & YOUNG PEOPLE: OUR RECOMMENDATIONS

This theme of work focuses on the development of solutions to support an inclusive education culture and promote accessible learning about ethnic diversity and Black History within Cardiff schools.

Our recommendations also include actions relating to the school workforce, improving representation in governing bodies and curating a whole-school approach to race equality.

The Taskforce have benefitted from the expertise and support of many talented practitioners and school leaders in developing these proposals. Together, they are a comprehensive and realistic set of measures which Cardiff schools and education partners can adopt and progress, ensuring that racial equality is a 'golden thread' running through all school policies. Whilst our proposals in this area can be progressed through the efforts of local stakeholders and partnerships, there are currently some limitations on the extent to which they can be achieved without further support and collaboration at a national level. Specifically, the Taskforce recognises that the correction of underrepresentation of ethnic minority groups in the teaching workforce is a complex Wales-wide issue and supports further efforts to attract ethnic minority graduates into teaching at a national level.



## 2.1

### RECOMMENDATION:



#### Strengthen the local approach to bullying and prejudice-related incidents at school

### IN DEPTH:

As Wales' capital city and with over a third of Cardiff pupils being from an ethnic minority background, Show Racism the Red Card's research findings that many Welsh pupils continue to experience and observe race-related bullying are a call for further action on prejudice-related bullying and a more comprehensive system response in our city.

This research indicates that more guidance and training would support teachers and the broader education workforce to ensure a consistent and high-quality response to incidents of racism and race-related bullying in school settings.

As a Taskforce, we encourage the Council to ensure appropriate resources and skill development opportunities are offered to teaching staff to address the findings of this report and other relevant evidence regarding prejudice-related bullying and the impact on children's wellbeing.

A framework for responding to prejudice-relating bullying should be made available to schools, parents and wider stakeholders. This should clarify and raise awareness of pupil's rights and responsibilities and how schools answer to such behaviours with an age-appropriate and child-centred response. This should include specific advice on supporting young people experiencing prejudice-related bullying and holding supportive conversations with young people which supports their learning and personal development.

Schools should also be encouraged and supported to record such incidents with consistency and seek advice and support from both the Council's education team and expertise from the voluntary sector as needed.

Cardiff has an opportunity to develop a clear response to this national issue and doing so will make significant contributions to ethnic minority pupil's wellbeing and ensure positive education experiences. As an ethnically diverse city this must form part of holistic pupil support and the pastoral care offer for young Cardiffians, both now and for the future.



## 2.2

### RECOMMENDATION:



#### Extend the work of Schools of Sanctuary to a broader network of schools and support the participation of refugee and asylum-seeking communities

### IN DEPTH:

Schools of Sanctuary is a growing network of more than 300 primary and secondary schools across the UK. Driven by teachers, school staff, parents, governors and community groups, this network supports the thousands of young people seeking sanctuary in the UK, raises awareness of the issues facing people in the asylum system, challenges misconceptions and builds social cohesion.

Schools of Sanctuary forms part of The City of Sanctuary Network, an active welcome movement that throughout the UK and Republic of Ireland, coordinating activity and providing support to displaced people at a local level. Cardiff has held City of Sanctuary status since 2010 and it's first School of Sanctuary was Llanishen High School, achieving this status in 2018.

An accredited School of Sanctuary is one that has received recognition from City of Sanctuary UK or a partner organisation in the form of a Sanctuary Award for its good practice in fostering a culture of welcome and inclusion. To be eligible for the award, schools must demonstrate that they have implemented three key principles:

- **Learn:** Schools help their students, staff and wider community learn about what it means to be seeking sanctuary and the issues surrounding forced migration.
- **Embed:** Schools are committed to creating a safe and inclusive culture of welcome that benefits everybody, including anyone in their community seeking sanctuary.
- **Share:** Schools share their values and activities with their local communities.

Whilst several Cardiff schools have already benefited from membership of the Schools of Sanctuary programme, particularly those which serve and educate many young people whose families have experienced forced displacement, the Taskforce encourages the extension of the programme to a wider school audience.

With Cardiff, as a city, making significant contributions towards refugee resettlement and the support of asylum seekers within both a Welsh and UK-wide context, it is important that our city's young people are provided with opportunities to learn about forced migration. Cardiff schools can make an important contribute to improved understanding and support for displaced people in our city.

Engaging Cardiff residents with personal experiences of the UK asylum system in this work would provide further opportunities for empowerment, meaningful connection and learning.

## 2.3

### RECOMMENDATION:



To improve the experiences of Black, Asian and Ethnic Minority learners and teachers in schools by taking an inclusive and anti-racist approach to teaching and school experience

### IN DEPTH:

Our schools can change lives, which is why it is vital for all schools to be inclusive to get the best from our pupils. They also offer a place for us to challenge the 'normalisation' of racial inequality.

Supporting a proactive and intentional approach within the school community empowers pupils intellectually, socially and emotionally, preparing them for a contemporary multicultural and multiracial world.

The Taskforce recommends that Cardiff schools are supported to engage pupils in meaningful conversations, learning and actions which counter racial prejudice and that they are proactively supported to be part of the city's journey to deliver change on persistent inequalities.

To support Cardiff schools in developing and sharing anti-racist approaches, the Council should look to identify practical actions that school leaders and teachers can take, both in the classroom and school wide, to challenge racism and racial inequalities. Several Cardiff schools have already developed meaningful and comprehensive approaches for learning about our city's communities and migration history. The Taskforce encourages further collaboration and mentorship between schools to extend and strengthen this approach.

Some key questions the Taskforce encourage school leadership and staff to reflect on with their school community include:

- Do we really know who our pupils are?
- Are we aware of the wider social, community and cultural issues that many of our pupils are living through?
- How do we get to know our pupils and ensure that their views, interests, lived experiences and aspirations inform and guide our teaching practices?



## 2.4

### RECOMMENDATION:



Support the diversification of the teaching workforce through a teaching assistant 'Step into Teaching' programme

### IN DEPTH:

The benefits of a diverse education workforce are well-documented; however, ethnic minority groups remain underrepresented in the teaching profession in Wales relative to the overall population (Education Workforce Council, 2020). Cardiff is no exception to this trend but as Wales' ethnically diverse capital city, has an opportunity to develop and test new approaches to improve representation in the teaching workforce.

It is estimated that 8% of Cardiff's Teaching Assistants (TA's) are from an ethnic minority background, compared to approximately 1.5% of teachers.

Whilst these figures are still not representative of the city's ethnic diversity, and particularly so with respect of the diverse school population, the existing ethnic minority Teaching Assistant workforce are a cohort of experienced local education practitioners whose progression into Qualified Teacher Status (QTS), where appropriate and where the member of staff wishes to do so, would support workforce diversity amongst QTS.

Alongside graduate routes, local stakeholders should explore growing local talent within the existing workforce and supporting TA progression where staff aspire to progress to teaching roles and have, or could develop, the skills to do so.

There is an opportunity to connect staff to existing fast-track qualification routes to Qualified Teacher Status for Teaching Assistants offered by some UK universities. This could be supplemented with additional bespoke approaches which respond to the specific skill development needs of Cardiff's ethnic minority teaching assistants, for example, further ESOL provision integrated into the qualification programme.

Further collaboration with the Welsh Government and Educators Wales would support progress on this recommendation and align with the commitments made in the Welsh Government's Race Equality Action Plan.



## 2.5

### RECOMMENDATION:



Increase representation of ethnic minority residents in school leadership through a School Governors entry programme

### IN DEPTH:

School leadership teams have a critical role to play in shaping an inclusive school culture and implementing effective anti-racism policies. A diverse governing board is a stronger board, reflecting school communities and the wider city.

Limited ethnicity data is available regarding current School Governors in Cardiff, but informal feedback suggested that further efforts to support ethnic minority participation in Governing Bodies were needed.

We recognise the importance of diverse boards so that decisions are made robustly with input from people with a variety of lived experiences – as well as varied skills. It’s also vital that children see people of all backgrounds in board-level positions.

As such, the Taskforce encourages Cardiff’s education sector to firstly establish baseline data on school governor diversity and consider new methods of recruitment to attract residents from ethnic minority backgrounds into these important roles.



## 2.6

### RECOMMENDATION:



Increase visibility of Black and Ethnic Minority role models and public education on Black History through events programming

### IN DEPTH:

On Wednesday 29th September 2021, the historic unveiling of a monument to honour Betty Campbell, Wales’ first Black head teacher and prominent Black history campaigner, shone a spotlight on one of Cardiff’s significant Black changemakers. This was rightfully an immensely proud moment for our city and encouraged reflection on progress made and the distance we still have to travel on equality.

This installation of the monument was particularly significant for our city’s Black and Ethnic Minority residents and young people, with Betty’s legacy

enshrined in the prominent Central Square for future generations to share in and celebrate.

To support continued reflection and learning on the values of equality and education which Betty stood for, the Taskforce encourages the introduction of an Annual Betty Campbell Lecture at a prominent Cardiff venue to ensure the continuance of Betty’s significant legacy of inclusive education in Wales’ Capital City and her role in advocating for the introduction of Black History into the school curriculum.



# THEME 3: CITIZEN'S VOICE

## Data Insights: Citizen's Voice

Parliaments and Councils are representative institutions, with those elected representing the voice of their constituents within the UK's system of formal representative democracy.

While there have been improvements in the representation of ethnic minority groups in Westminster and the Senedd, ethnic minority people remain under-represented in the roles of MP, MS and as local councillors, in relation to the general population of Wales.

Here we have summarised available data and research on political representation and citizen's engagement for ethnic minority groups. This data indicates the current state of play with regards representation in politics and decision-making and the provision of fair access to influence and power in the city.

Note: There is limited data available around the demographics of groups who engage in democratic processes at a UK or Wales level, and even less so available when looking at democratic engagement at a city level, so here we primarily rely on UK-wide research for general insights into the experiences of ethnic minority residents.

### UK Parliament

The number of ethnic minority MPs has grown at every election since 1987, reaching a record high of 65 in the 2019 General Election, of which 37 are women. This now means that one in ten MPs are from an ethnic minority background, when 10 years ago the figure was just one in forty.

In Wales, Scotland and Northern Ireland there are currently no ethnic minority MPs.

### Welsh Parliament

Three (5%) of the 60 Members serving members of the Senedd are from an ethnic minority background. The longest serving is Vaughan Gething, representing the constituency of Cardiff South and Penarth, who has been a Labour MS since 2011 and is currently Minister for the Economy, having previously served as Minister for Health and Social Services from 2016-2021.

The first ethnic minority member of the Senedd was Mohammad (Oscar) Asghar, elected as a Plaid Cymru AM in 2007 and then as a Conservative in 2011 and 2016. His daughter Natasha Asghar was elected in his seat in 2021 making her the first female ethnic minority member of the Senedd.

### Local Government in Wales

The most recent survey of councillors and candidates in Wales (2017) reported that 1.8% of county and borough councillors who provided their ethnicity data were from ethnic minority groups, up from 0.6% in 2012. The corresponding ethnic minority population of Wales was 4.4%.

### Councillor ethnicity data for Cardiff Council

In actioning one of the Taskforce's early recommendations, Cardiff's Democratic Services Team supported our request to examine the ethnicity data of current elected representatives of the city and completed a baseline data capture for current Cardiff Councillors in autumn 2021.

The survey findings indicate that 12% of serving Councillors during the 2017-2022 municipal term are from an ethnic minority background.

This finding is based on an 85% completion rate (64 out of 75 Councillors responding to the survey). Ethnicity data has not previously been captured for Cardiff Councillors so it is not possible to describe any local trends but the Council has outlined its intention to collect this data in future municipal terms, actioning our recommendation within this theme.

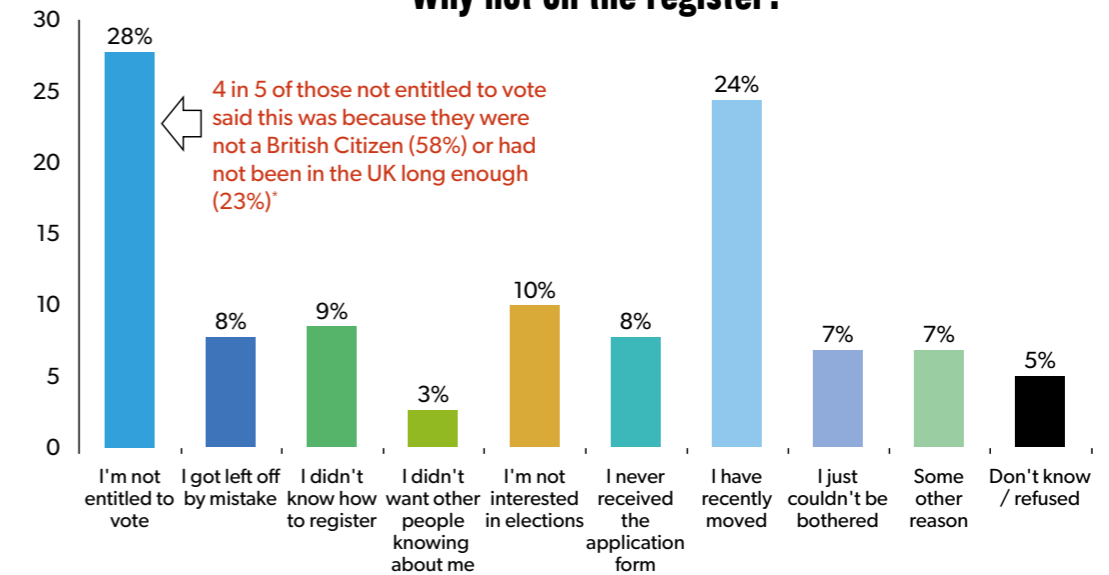
### Voter registration & turnout

Research by the Electoral Commission indicates that people from ethnic minorities are under-registered to vote. The Commission's data indicates that 25 per cent of Black voters in Great Britain are not registered. It also says that 24 per cent of Asian voters and almost a third (31 per cent) of eligible people with mixed ethnicity are not yet registered, compared to a 17 per cent average across the population.<sup>4</sup>

There is limited data available to differentiate the effects of educational attainment, income, socioeconomic context, home ownership and other relevant factors in voter registration trends. It is also not currently possible to understand any potential correlation between the fact ethnic minority groups have a younger population than the White ethnic group and young people are less likely to be registered to vote.

There is not a great deal of data to understand the reasons for under-registration. Theories include that those who have migrated to the UK and are eligible to vote are under-registered but there is no quantitative evidence on the extent of this gap. Other barriers may include a lack of English language skills or lack of knowledge of the process and elections but the available research is limited. A 2010 study, The Ethnic Minority British Election Study, completed in partnership with the Runnymede Trust, found that nearly 3 in 10 of non-registrants did not think that they were entitled to vote, while a quarter had recently moved home. With the extension of voting rights to all non-UK born nationals legally resident in Wales for both Senedd and local government elections, this finding requires additional reflection to support the communication of these additional rights to the Welsh residents to which it applies.

### Why not on the register?



Base: All EMBES respondents not on the register (255)

Source: BMRB

Q. What are the main reasons you are not on the electoral register? MULTICODE

\*There may be those in this group that were unaware that Commonwealth nationality is sufficient to claim the franchise<sup>6</sup>

<sup>4</sup> Electoral Commission, Voter engagement among Black and Ethnic Minority Communities, [https://www.electoralcommission.org.uk/sites/default/files/electoral\\_commission\\_pdf\\_file/Ethnicfinalreport\\_11586-6190\\_E\\_N\\_S\\_W\\_.pdf](https://www.electoralcommission.org.uk/sites/default/files/electoral_commission_pdf_file/Ethnicfinalreport_11586-6190_E_N_S_W_.pdf)

<sup>5</sup> The Electoral Commission, 1 in 4 black and Asian voters are not registered to vote, warns the Electoral Commission, <https://www.electoralcommission.org.uk/media-centre/1-4-black-and-asian-voters-are-not-registered-vote-warns-electoral-commission>

<sup>6</sup> Ethnic Minority British Election Study: Electoral registration and turnout data <https://www.runnymedetrust.org/uploads/EMBES%20Turnout%20and%20Registration.pdf>

Election turnout rates are logically linked to registration rates: one cannot vote without being registered. However, someone may be registered and not turnout to vote — it is therefore important to consider whether there are specific challenges to turnout faced by certain groups.

Turnout is calculated by local authorities from the votes cast versus the total eligible registered voters. No demographic data about those turning out is captured at the point of voting, so any breakdown by age or ethnicity relies on survey data. This data is however unreliable because people tend to overstate their turnout history.

The most robust evidence on turnout comes from the British Election Study, which shows a significant gap in turnout by age with older people much more likely to vote than young people.

## Information about elections and political engagement

Unfortunately, there is insufficient data on how people learn about elections, let alone on whether this differs demographically or between other characteristics.

The best available data on this subject comes from Hansard Society's Audit of Political Engagement,<sup>9</sup> which shows that TV and radio news still has the biggest role to play in getting people election information, though younger people are more likely seek information online and through social media.

There's an around an 80% chance that a 70-year-old voted at the last general election, compared with a 45% chance that a 20-year-old did.<sup>7</sup>

This finding is significant in the context of recent reforms to lower the voting age to 16 in Wales for Senedd and Council elections. Other survey data suggests that turnout amongst ethnic minority groups is five percentage points lower than average, though this may simply reflect their lower registration rate. There is also some evidence that people from ethnic minorities are more likely to vote if someone of the same ethnicity is standing.<sup>8</sup>

# CITIZEN'S VOICE OUR RECOMMENDATIONS

Our recommendations in this area focus on locally led solutions to increase ethnic diversity in politics, decision-making and broader forms of participation.

The trend of increasing ethnic diversity in our city, like other cities across the UK, raises important questions about how ethnic minority communities can be better served and represented by existing democratic systems and other, less formal but important, mechanisms of participation.

Supporting increased representation requires support and action from political parties in candidate selection processes and measures to broaden party membership, and from government institutions in delivering non-partisan information about elections and other relevant topics, such as general information about the role of councillors.

Delivering representative parliaments and Councils will therefore be best achieved through broad collaborative action. This may include Cross-Party commitments on supporting diversity in democracy, and this is one of our Taskforce's recommendations.

It is important to recognise that there are natural limits to what the Council can achieve acting alone as an institution in the delivery of our recommendations against this theme. We however encourage the Council to support and facilitate general objective approaches which contribute to improved public awareness of the democratic calendar, voter registration and turnout and other important aspects of our recommendations concerning wider civic participation and voice in city life.



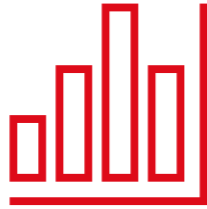
<sup>7</sup> [www.britishelectionstudy.com](http://www.britishelectionstudy.com)

<sup>8</sup> Electoral Commission, Voter engagement among Black and Ethnic Minority Communities

<sup>9</sup> [www.hansardsociety.org.uk/projects/audit-of-political-engagement](http://www.hansardsociety.org.uk/projects/audit-of-political-engagement)

# 3.1

## RECOMMENDATION:



Improve data collection and analysis on civic participation

### IN DEPTH:

Our first recommendation against this theme concerns data collection and analysis on civic participation, in particular with respect of Councillor demographic data. At the commencement of the Taskforce, no local level data was available to provide insight into current levels of ethnic minority representation across Cardiff Council's elected members.

We requested that the Council's Democratic Services team deliver a survey during the course of the Taskforce's proposal development stage to provide insight into the current democratic landscape of the city. This has been completed and the results have been provided in the data section at the beginning of this chapter.

Moving forwards, we recommend that the Council captures equality data at the commencement of a new municipal term following an election and completes analysis of this data by the protected characteristics listed in the Equality Act. This analysis should also be available in the public domain.

This could be supplemented by additional relevant participation data regarding the Council's broader community engagement work, including demographic data for key consultations such as the Budget and annual city residents' survey, Ask Cardiff. This information is routinely provided in public reports but could be brought together into a single place to provide a set of city indicators on participation and representation.



# 3.2

## RECOMMENDATION:



Support the Race Alliance Wales manifesto and complete benchmarking against their recommendations to advance race equality in Wales

### IN DEPTH:

Race Alliance Wales (RAW) is an ethnic minority led initiative, which aims to provide a self-directed space where Black, Asian and Ethnic Minority organisations and individuals can collaborate on solutions to address issues of racial injustice in Wales.

The Race Alliance Wales manifesto has been developed through a broad membership of ethnic minority Welsh citizens through a series of meetings and discussions, drawing upon relevant data, as the Cardiff Taskforce has, to shape their policy recommendations.

The completed manifesto reflects the policy priorities of Wales' ethnic minority citizens, having been produced through extensive and collaborative discussions throughout the pandemic and in the wake of the international Black Lives Matter movement.

In light of, what appears to be, at least a partial democratic deficit for ethnic minority groups, outlined in the data at the beginning of this chapter, the Taskforce recommend the Council reflects on its progress and relevant activity to deliver the recommendations of the Race Alliance Wales Manifesto and recommendations.

These recommendations are far-reaching and not all areas are the policy responsibility of the Council, but in the setting of new policy priorities following the 2022 local government elections in Wales, this work provides important insight into the experiences and needs of ethnic minority residents.

As Wales' capital city, the delivery of this recommendation will contribute to Cardiff's positioning as a leader in the advancement of race equality and encourage other Welsh Council's and public institutions to reflection on their own response to ongoing and well-evidenced inequalities for ethnic minority people in modern Welsh society.



# 3.3

## RECOMMENDATION:

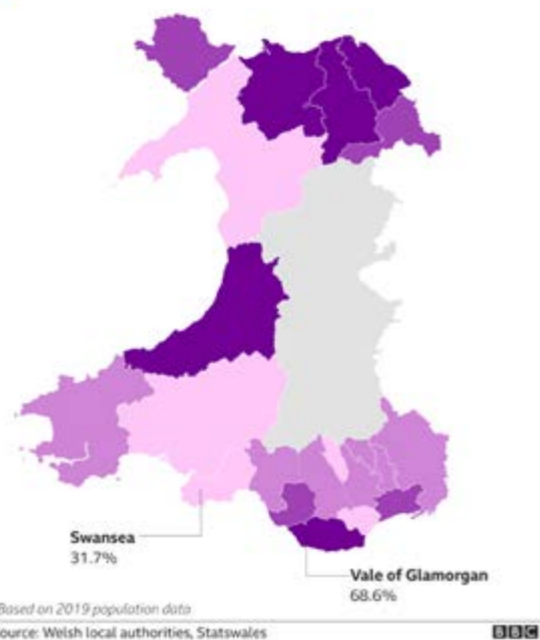


### Scope opportunities to increase youth participation and engagement with civic processes and develop mechanisms to support ethnic minority youth representation in politics and decision-making

#### Spotlight on: Youth political participation, a summary of evidence

- In the 2017 UK General Election, young people turned out to vote in greater numbers than at any other point for 25 years.
- Polling research from Ipsos MORI suggests that turnout in 2019 ranged from 47% among 18 to 24-year-olds up to 74% among over-65s. This was a wider gap than in 2017, when the same pollsters measured turnout at 54% and 71% respectively in these age groups.<sup>1</sup>
- In the 2021 Welsh Parliamentary elections, poll data suggests that just 46% of 16–17-year-olds used their new voting rights and that young voter registration for 16–17-year-olds in Cardiff was the lowest of any local authority area, at 34.72%.<sup>2</sup>
- The Ethnic Minority British Election Study (EMBES), found that whilst age is a significant factor determining turnout across all ethnic groups, the effect of age is actually weaker for ethnic minorities groups than for White British young people.<sup>3</sup>

**16 and 17-year-old voter registration in Wales**  
 No data 30 to 40% 40 to 50% 50 to 60% 60 to 70%



© BBC Wales

**Sources:**

1. Ipsos Mori, How Britain voted in the 2019 election, How Britain voted in the 2019 election | Ipsos
2. Local Authority Data, Stats Wales, visualisation from BBC Wales, Welsh elections: At least 35,000 young people not registered to vote, <https://www.bbc.co.uk/news/uk-wales-politics-56919775>
3. Heath, Anthony F., et al. "British Election Study Ethnic Minority Survey." UK Data Service. SN 6970 (2010).

## IN DEPTH:

Recent years have seen anxious debate about youth political apathy in the UK, connected to low levels of electoral participation amongst 18–24-year-olds.

A lack of youth engagement in mainstream politics certainly matters in democratic terms but should not lead to the conclusion that young people are apathetic about political issues.

The last two years in particular have demonstrated preferred grammars of action for Cardiff's young people on issues which matter to them, with a clear preference for hands-on, direct forms of activism and a tendency to mobilise horizontal, loosely formed groups and networks rather than vertical integration with formal democratic institutions and systems to create change.

The possibility to connect young people with mainstream political institutions rests in the capacity of institutions to adjust participatory opportunities to young people's preferred flatter, more networked, personalised, 'DIY' forms of activism.

In many respects, the approach taken in the establishment and delivery of Cardiff's Race Equality Taskforce, with city residents co-producing city solutions through a supportive process of dialogue and collaboration, could provide a blueprint for future engagement of residents in policymaking. These methods could help to connect young people to actual decision-making in a meaningful way.

In setting the priorities for our Taskforce, our public consultation evidenced a clear desire to shift power from the centre into communities. 21st century Britain has seen the marginalisation of those on low-incomes and widening income-inequality. This has understandably led to political disillusion and non-participation, and whilst these phenomena are by no means limited to our city, they complex issues which should concern us all, irrespective of our personal political beliefs.

In our consultation and other evidence that we have considered, there was clear correlation between social class, using postcode data and the deprivation index, and the extent to which local people feel

underrepresented and unable to influence the decisions being made about their lives and their city.

Race and class have a complicated and important intersection and it is critical to recognise that the additional factors of racial discrimination and bias present added barriers for working class ethnic minority young people in achieving their aspirations and full potential.

Modern class identities are complex to define but for ethnic minority young people growing up in low-income families, it is clear that both factors of race and class shape their opportunities and limitations placed upon them through stereotypes, prejudice and societal expectations about their outcomes and achievements. This is demonstrated in a wealth of official government data and peer-reviewed research.

This complex interplay leads the Taskforce to specifically recommend that new efforts are made to put power in the hands of the Cardiff's ethnic minority young people.

New opportunities must be made available to marginalised young people to enable them to have their voices heard and influence change in the city.

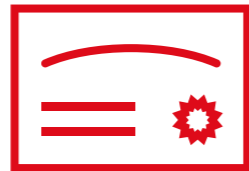
The mechanisms for doing so should be designed by the young people they are intended to reach so we are not prescribing a specific model in our recommendation however, the Taskforce heard of promising programmes from across the UK, offering the development of political skills, democratic education and building change-making capacity in working-class communities with young people of diverse ethnic backgrounds.

As a Taskforce, we encourage the development of new approaches to youth leadership development which respond to the issues we have outlined and specifically support ethnic minority young people from traditionally marginalised backgrounds to develop the skills, insights, networks, and self-belief needed to aspire to positions of power and influence, both formal and informal.

<sup>10</sup> Office for National Statistics, Household Income Inequality, UK: financial year ending 2020, [www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/householdincomeinequalityfinancial/financialyearending2020](http://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/householdincomeinequalityfinancial/financialyearending2020)

# 3.4

## RECOMMENDATION:



Cardiff Council’s elected members should support the Welsh Local Government Association’s Diverse Council Declaration, to support diversity in democracy and representation of ethnic minority groups in the capital city

## IN DEPTH:

While Cardiff performs better than many Councils in terms of councillor diversity, people from Black, Asian and ethnic minority backgrounds, women, younger people and those with a disability are not yet proportionately represented in the Welsh capital’s Council chambers.

One of our early recommendations within this theme was for Cardiff Council to adopt the recommendations of the Welsh Local Government Association’s (WLGA) Diversity in Democracy report. This report is the culmination of a cross-party working group to support increased representation of minority groups across Welsh Councils and ensure a supportive environment for Councillors who step forward to represent their community. The implementation of the recommendations contained

within the WLGA report will require action from both the Council’s Democratic Services Team, Democratic Services Committee and cross-party approaches. It is the view of the Race Equality Taskforce that there must be a sustained commitment from all parties to support efforts to increase ethnic diversity if Council chambers are to keep pace with modern Cardiff and look like the city that it represents.

In adopting the recommendations of the Diversity in Democracy report, the Council should support the Diverse Council Declaration as a public commitment and ensure the report’s recommendations are implemented through a clear action plan following the 2022 Local Government elections in Wales to engage new elected members in this important initiative for the city.



# 3.5

## RECOMMENDATION:



Improve representation from Cardiff’s ethnic minority communities in key decision-making panels

## IN DEPTH:

This recommendation points towards the Taskforce’s view that decision-making panels, advisory boards and committees in the city should reflect the views and experiences of Cardiff’s ever-increasing proportion of ethnic minority residents. This is not about a political agenda or quota approach but ensuring diversity of thought and informed decision-making which reflects our city’s needs, priorities and ambitions.

In particular, institutions in Wales’ capital city should reflect on the prevalence of all-White & all-male panels, and steps to ensure greater representation of the city’s true diversity across relevant panels and boards.

In developing our proposals, the Taskforce consistently heard that a lack of visibility in positions of power sends a subliminal message to underrepresented groups that their views are unimportant. Correcting this will not be immediate but is an action which all elected representatives and public officials in the city, from all spheres of government and public services, need to take personal and collective accountability for.

A natural starting point will be the consideration of local statutory committees following the 2022 Local Government Election, but as with our previous recommendation, can only be achieved with buy-in and commitment on a cross-party basis as political parties make their nominations to these committees at the commencement of the municipal term.

Beyond committees and boards where elected members serve and represent the city, these principles should also apply in a broader sense. This includes ensuring that event and conference organisers consider an appropriate mix of speakers, that hiring managers reflect on the diversity of their recruitment panels including inviting external panel members where appropriate, and that public services consistently reflect on who they are reaching with their consultation and engagement activities and seek to attain quality representation.

While we have primarily focused on ethnicity, it is also equally important to ensure that these actions include focus on women, the LGBTQ+ community and those with disabilities.



# 3.6

## RECOMMENDATION:



**Broaden participation and accessibility in city planning and ensure there are appropriate platforms for engagement and community voice in the design of the city**

### Spotlight on: Cardiff's Local Development Plan

Cardiff Council is currently preparing its new Local Development Plan (LDP) for the city. The LDP will help shape Cardiff for the next 15 years to 2036 ensuring the right development happens in the right place at the right time, benefitting communities and the economy and setting out which areas need to be protected.

There are many stages in preparing a Local Development Plan as set out in our Local Development Plan Delivery Agreement.

The LDP Regulations require the Council to work in partnership with a wide range of stakeholders in preparing the LDP, including specific and general consultation bodies and the general public.

Find out more about the Local Development Plan process and how you can get involved at: [www.cardiffldp.co.uk](http://www.cardiffldp.co.uk)



# IN DEPTH:

Urban planning is the art of giving shape, design, and structure to cities and towns. It involves various processes like the arrangement and design of buildings, transport systems, public spaces as well as good public amenities. In the context of climate emergency, it has become increasingly important to use available land and infrastructure in the best possible way, particularly within cities with fast-growing populations and limited space.

To effectively serve residents, urban planning processes must engage with the demographic reality of Wales' capital city. This includes understanding the needs of our fast growing and increasingly diverse population, recognising the significance of neighbourhoods in the traditional docks area to our longest-standing Black and ethnic minority communities and the rapid growth of Cardiff's international student community.

The historic relationship between city planning and the ethnic minority communities of our city has been complex. Our Taskforce understand the community view that the development of Tiger Bay did not deliver the necessary benefits to Cardiff's long-standing ethnic minority communities whose ancestors have lived in the streets of Butetown for over a century. Over time, these changes have come to be seen as the gentrification of a diverse communities' traditional neighbourhood and this requires careful consideration in future city design and policy making.

This starting point makes future planning decisions regarding the development of Atlantic Wharf a critical moment to reset and deliver community assets including housing and job opportunities for local ethnic minority people and we have made a recommendation in relation to this earlier in our report within the Employment and Representative Workforce chapter.

Beyond this, mechanisms to support citizen's engagement and voice in significant decisions regarding the future design of our city should be strengthened. Planning law is incredibly complex and opaque to the general public. Positioning planners so that they are more effective, creative and visible in their engagement with ethnic and racialized difference in the contemporary city should be a priority.

The Taskforce considers there to be three critical interfaces for future engagement:

- Meeting the city's housing needs, particularly with regards affordable housing, for which there is significant demand generally across all ethnic groups and specific housing needs for ethnic minority groups in the city
- Economic development plans and ensuring these connect with labour market realities for ethnic minority communities and deliver meaningful and measurable opportunities
- Planning for broader public services and public spaces and consideration of their accessibility and design to best meet the needs of ethnic minority groups

The Planning department should review their current accessibility measures for Planning Services to help users better understand processes and procedures and support public engagement on important planning issues. This could include straightforward public-facing information covering, for example: what planning do, why they do it, what users can do, what procedures are in place in Cardiff and what information can be provided for users to help them understand planning in Cardiff.

Beyond the provision of information, Community engagement works best where it is an ongoing cumulative process enabling relationships and trust to build and strengthen over time.

As the Council prepares its next Local Development Plan, individual engagement events should be planned and designed with this in mind and aim to contribute to the overall aims of the engagement process.

Community or voluntary groups may want to participate at a range of levels – from providing advice to co-designing the process and from undertaking some aspects of the engagement to delivering projects to meet some of the outcomes.

# THEME 4: HEALTH

## Data Insights: Health

There are health inequalities between ethnic minority and white groups, and between different ethnic minority groups. The picture is complex, both between different ethnic groups and across different conditions, and understanding is limited by a lack of good quality data.

### Health and Race: A complex picture

- Health-related quality of life scores at older ages, are lower than average among most ethnic minority groups, especially the White Gypsy and Irish Traveller, Bangladeshi and Pakistani groups, but not among some others (Black Caribbean, Black African and Mixed groups).
- Ethnic minority groups also have an increased prevalence of some long-term conditions, but not for others
- Analyses show most ethnic minority groups have lower overall mortality than white counterparts but also that this mortality advantage is reduced in their UK-born descendants
- Certain Black and Ethnic Minority groups have higher rates of some health conditions. For example, South Asian and Caribbean-descended populations have a substantially higher risk of diabetes; Bangladeshi-descended populations are more likely to avoid alcohol but to smoke and sickle cell anaemia is an inherited blood disorder, which mainly affects people of African or Caribbean origin.

Unpicking the causes of ethnic inequalities in health is difficult. Available evidence suggests a complex interplay of deprivation, environmental, physiological, health-related behaviours and the 'healthy migrant effect'.

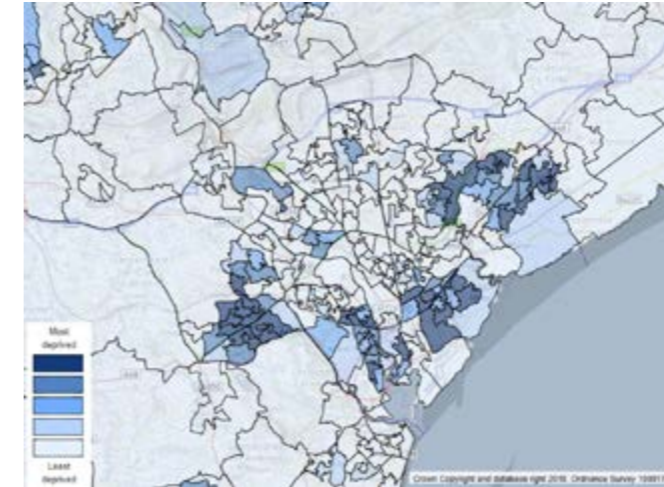
Ethnic minority groups are disproportionately affected by socio-economic deprivation, a key determinant of health status in all communities, but it is not clear if the relationship applies equally across all ethnic groups.

### EXPLAINER:

**The 'healthy migrant effect' is the mortality advantage in migrants relative to the majority population in host countries that is reported in many countries. It could be due to the selective migration of healthy individuals and/or healthier lifestyles such as lower smoking and alcohol consumption.**

## Health Domain: Welsh Index of Multiple Deprivation

The health domain within the Welsh Index of Multiple Deprivation includes four indicators: cancer incidence; limiting long-term illness; all-cause death rate; and low birth weight. A high proportion of Cardiff's Black/African/Caribbean/Black British ethnic group (31.7%) reside in the most deprived areas of Cardiff within the WIMD health domain.



## COVID-19

Although the coronavirus pandemic created widespread fears and risks to lives and livelihoods across communities in Wales and around the world, the impacts on Black and ethnic minority groups have been especially profound.

The Covid-19 pandemic has had a disproportionate impact on ethnic minority communities, who have experienced higher infection and mortality rates than the white population. Geography, deprivation, occupation, living arrangements and health conditions such as CVD and diabetes accounted for a large proportion, but not all, of the excess mortality risk of Covid-19 in ethnic minority groups. Research from the Kings Fund, exploring health data from England concluded that Covid-19 has reversed the previous picture for some ethnic minority groups which now have higher overall mortality than the white population.

Following the Covid-19 pandemic, NHS Wales is taking steps to improve ethnicity recording in health records and future data collection should facilitate a better understanding of ethnic differences in health. Between April and May

2020, research by the Office of National Statistics found that individuals from Asian/Asian British background were 4.8 times more likely to test positive to COVID-19 than people of White ethnicity.<sup>11</sup>

In addition, COVID-19 death rates per 100,000 population were 2.7 and 2.0 times higher for males and females of Black-African ethnic background compared to those of White ethnicity.<sup>11</sup>

In another recent report, ONS examined the relationship between ethnicity and COVID-19 mortality by building a multivariable model to take a number of factors into account. These included age, health, geography, socioeconomic variables and occupation. Once adjusting for all these factors, the report found statistically significant raised rates of death for males and females of Black African, Black Caribbean, Indian, Pakistani and other ethnic group. After adjustment, compared to White males; the rate of deaths among Black African males was 2.3 times greater, for Bangladeshi males it was 1.9 times greater, for Black Caribbean males 1.7 times greater and for Pakistani males 1.6 times greater.<sup>12</sup>

<sup>11</sup> ONS, Coronavirus and the social impacts on different ethnic groups in the UK:2020, Coronavirus and the social impacts on different ethnic groups in the UK: 2020 - Office for National Statistics (ons.gov.uk)

<sup>12</sup> Updating ethnic contrasts in deaths involving the coronavirus (COVID-19), England and Wales: deaths occurring 2 March to 28 July 2020, Updating ethnic contrasts in deaths involving the coronavirus (COVID-19), England and Wales - Office for National Statistics (ons.gov.uk)

## Spotlight on: NHS Race and Health Observatory

A new NHS Race and Health Observatory has been established by the NHS Confederation to examine ethnic health inequalities in England (both outcomes and experiences).

The Observatory will work towards tackling ethnic and racial inequalities in healthcare amongst patients, communities and the NHS workforce. It will be a proactive investigator, making evidence-based recommendations for change and helping to facilitate practical implementation of those recommendations across health and care.

The Observatory has five workstreams:

1. Improving health and care: Focusing on areas in health and care that have long shown ethnic inequalities in access, experience or outcomes, working to reshape policy and practice so that they support fair health and care for all, from neonatal health to end of life care.
2. Empowering Vulnerable Communities: The most vulnerable in society are often those who experience the cumulative impact of health inequalities. The Observatory's work in this area will build understanding around complex social determinants of health as well as the resulting effect that can have on individual personal choices.
3. Innovating for all: Digital technology has great potential to improve how the health and care sectors deliver their services in a modern way; providing faster, safer and more convenient care. It is essential that new and innovative approaches, technologies and data collection structures are designed to help reduce ethnic health inequalities.
4. Creating equitable environments: rebuilding and supporting health and care systems, change levers and management leadership behaviours – to tackle ethnic health inequalities and promote quality of care, safety, compassion and a fairer experience for patients, NHS staff and diverse communities alike.
5. Collaborating globally: working both nationally and internationally, connecting with organisations and key stakeholders from across the country and around the world and sharing innovative research, practice, and learning between communities and across borders.

**Find out more:** <https://www.nhsrho.org/>



## HEALTH: OUR RECOMMENDATIONS

In partnership with Cardiff & Vale Health University Health Board, three priorities were agreed with our Taskforce for future development. The context of the ongoing pandemic and emerging evidence on the disproportionate impact of COVID-19 on ethnic minority groups meant that each of the recommendations outlined in this section have been progressed with urgency during the course of the Taskforce programme.

The recommendations in this chapter respond to early findings and reflections regarding ethnic minority health inequalities at the onset of the Covid-19 pandemic and the fact that the limited availability of data compromises current opportunities to focus on broader service improvements and reforms both in the immediate and longer term.

These three priority areas will contribute to an improved understanding of ethnic minority resident's health outcomes and support improved engagement between the health board and ethnic minority Cardiff residents at a local level.



## 4.1

**RECOMMENDATION:**

Improve ethnicity recording within the healthcare system, for both patients and staff

**IN DEPTH:**

Ethnicity data is essential for improving the health and wellbeing of people from Black, Asian and Minority Ethnic communities.

A lack of ethnicity data profiling of patients accessing healthcare services in Wales and the wider UK has long impeded the informed development of quality of care and research efforts for ethnically diverse populations. Extensive research has explained the crucial role of health data in:

- Supporting needs assessments and service planning
- Enabling monitoring of equity of access and outcomes
- Informing clinical practice
- Improving the evidence on inequalities in population-based risks and outcomes
- Supporting high quality research

The need for accurate patient ethnicity data has been explicitly demonstrated by the Covid-19 pandemic, with clear disproportionality for ethnic minority groups as indicated in the statistics listed in the earlier data section of this chapter. Good quality data is an essential cornerstone of an effective health care system. Without it, the ability to deliver equitable, high-quality care to all is significantly compromised. This applies also to the collection and availability of ethnicity data within healthcare systems, however, analyses to date demonstrates significant limitations in both the completeness (coverage) and the quality of ethnicity recording in health records. The call for more comprehensive ethnicity recording as part of the response to Covid-19 could result in data that is more complete but the quality of which remains

poor. Both aspects need consideration and address in the Health Board's response.

It is important that NHS organisations and staff, along with GPs as first points of contact for citizens accessing most health services, are aware of how this information should be collected from patients and recorded. For example, ethnicity should be self-reported, using official classifications of ethnicity, and staff should understand that "not stated" is a legitimate response i.e., patients should have the option of declining to state their ethnicity (which is different to the "unknown" category, where it wasn't possible to ask the patient their ethnicity). There should also be an agreed set of rules to account for situations in which the patient has a temporary or permanent lack of capacity. In terms of staff, the NHS through its Electronic Staff Records has comprehensive ethnicity data in relation to its employees and this data is published and available in the public domain. This practice is not replicated in the case of patients and the Health Board is not yet in the position to provide quality ethnicity data regarding those accessing healthcare.

The Taskforce encourages the Cardiff & Vale University Health Board to work collaboratively with Welsh Health Equity Solutions Platform in the first instance, but also with other similar or related Welsh and UK organisations such as engage with the work of the NHS Race and Health Observatory, to advance progress on ethnicity recording within the healthcare system and ensure that this translates into meaningful changes in practice to address dual issues of data coverage and quality.

## 4.2

**RECOMMENDATION:**

Complete further investigation into the experiences of ethnic minority staff and patients and review the complaints and resolution procedure

**IN DEPTH:**

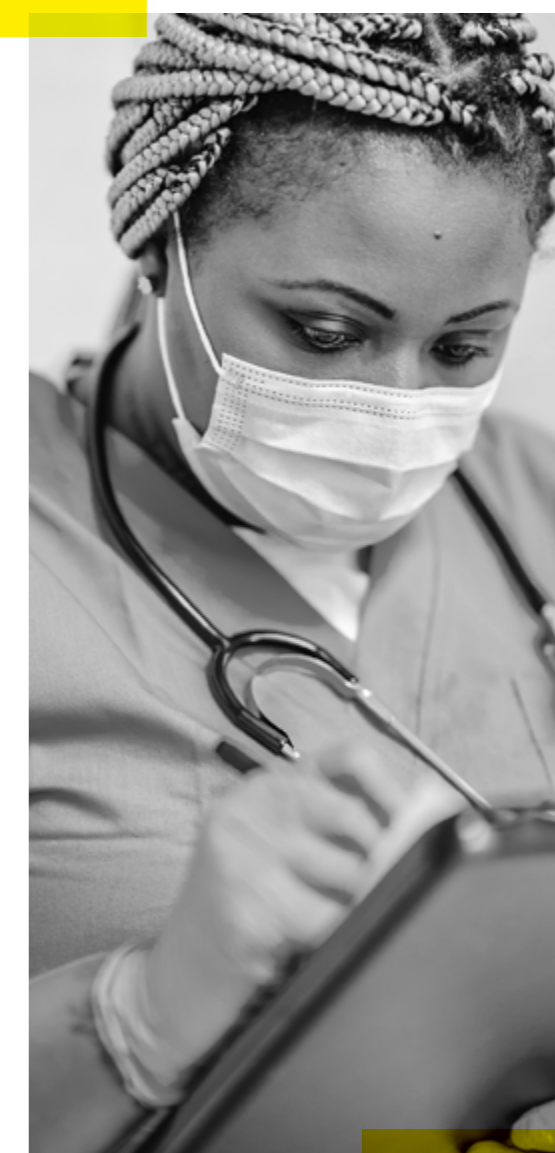
The NHS is often portrayed as a success story of ethnic minority workforce representation.

The recent UK-wide findings of the British Medical Association and other data on NHS staff experience, such as the NHS Workforce Race Equality Standard survey (note: this covers NHS Trusts in England only and does not include the local workforce in its findings), illustrate that ethnic minority staff in healthcare professions continue to have different and unequal experiences in the workplace compared to their White colleagues.

Doctors and other healthcare staff from ethnic minority backgrounds and those who qualified outside the UK but are registered to practice here, want to focus on caring for patients, without the burden of abuse that comes from demoralising and often debilitating experiences of racism in the workplace.

This evidence requires a comprehensive investigation into the experiences of local staff within the Cardiff & Vale University Health Board, and a review of the procedural response to racist incidents and bullying. Additional consideration should be given to the wellbeing support that is offered to ethnic minority staff who encounter these prejudicial behaviours at work.

The Taskforce was encouraged by the Cardiff & Vale Health Board's proactive response to this recommendation and the accompanying Delivery Report to the Taskforce's Report outlines the actions implemented to date.



## 4.3

### RECOMMENDATION:



Improve engagement and communication with Black and Ethnic Minority communities around health and health improvement

### IN DEPTH:

Throughout the course of the pandemic, local partner organisations have worked together to develop and deliver Test, Trace and Protect (TTP) services, the aim of which is to minimise risks to the local population from COVID-19 infection.

As part of this response, the Regional Operational TTP Board established an ethnic minority work stream to identify how best to engage with ethnic minority communities, and support the delivery of public health messages, the work of TTP and the mass vaccination programme. The outcome was the formation of a highly successful Ethnic Minority Subgroup, where key partners from the local community co-produced an effective communications and engagement programme with TTP partner organisations. A full report of this work can be found here - [Test Trace Protect supporting ethnic minority communities \(office.com\)](#)

In order to create a legacy from this work, and build upon the relationships developed during the pandemic, the Taskforce recommended that the University Health Board resource an engagement coordinator to lead on broader health promotion and awareness activity focusing on ethnic minority groups.

This role should lead the coordination of actions across the Health Board, Council and wider partners to develop effective partnership models which address health inequalities experienced by ethnic minority communities. This should include identifying and implementing policy and service interventions and delivering regular engagement with relevant statutory, voluntary and private sector stakeholders and communities on issues relevant to ethnic minority health equity.



# THEME 5: CRIMINAL JUSTICE

## Introduction

David Lammy MP's 2017 review shone an essential light on disparity in the treatment of, and outcomes for, Black Asian and Minority Ethnic (BAME) people within the criminal justice system in the UK.

These findings rightly prompted action from the UK Government's Ministry of Justice, which has twice reported on the implementation of the Lammy review's recommendations. Whilst there has been some progress made, it is clear that there is still a very long journey ahead to address overrepresentation and poor treatment of ethnic minority people across the whole criminal justice system.

Our starting point in developing our local approach was a recognition that, turning the dial on racial disparity in the criminal justice system needs a whole system approach. Many facets of the Criminal Justice System are non-devolved and remain the remit of the UK Government, meaning there are limits to what local stakeholders can achieve in addressing system-wide issues.

Nonetheless, a reformed system approach spans many areas of diverse services, many of which are designed and delivered through a local lens, from the diversion of young ethnic minority people away the criminal justice system, to providing rehabilitative support in communities. These are areas where a local approach can add considerable value and we can test new approaches, particularly with regards preventative services.

In developing our proposals against this theme, the Taskforce and local community members we engaged in local conversations regarding race and criminal justice often reflected on the relationship between the criminal justice system and a wide area of social and economic experiences.

Areas regularly discussed included employment, education, health and mental health, and housing, with many of those we engaged sharing the perspective that disadvantages and hardship within these domains contribute to crime and higher entrance rates to the criminal justice system. These reflections are supported by swathes of peer-reviewed evidence from sociologists and economists, which explain the intimate relationship between poverty and crime.

In light of this, the other recommendations we have made throughout this report should be recognised as further measures to address socioeconomic deprivation and structural racism in wider society which have led to the reality described by the data below. Our city can't make those changes alone, but we hope that our approach will support further action across all layers of government and public services.

Against the complex backdrop of issues and connectors relevant to the criminal justice landscape, the recommendations made here can only represent a starting point and do not constitute a full change programme.

The Taskforce are aware of the ongoing work of the Criminal Justice in Wales Board, which has identified Race Equality as one of its four priorities and has been resourced by criminal justice institutions in Wales to sustain its work programme. We encourage all local stakeholders to commit to engagement with this important and long-term work and recognise the particular significance these issues have in the context of our diverse capital city.

<sup>13</sup> UK Government, The Lammy Review, 2017, Lammy review: final report - GOV.UK (www.gov.uk)

<sup>14</sup> See the UK Government's most recent report on the implementation of the Lammy Review's recommendations for further information, Ministry of Justice and Race Disparity Unit, Tackling racial disparity in the criminal justice system: 2020, Published February 2020, Tackling racial disparity in the criminal justice system: 2020 - GOV.UK (www.gov.uk)

# DATA INSIGHTS: CRIMINAL JUSTICE

## Lammy Review Findings

The Lammy Review was an independent review into the treatment of, and outcomes for Black, Asian and Minority Ethnic individuals in the criminal justice system, commissioned by two Prime Ministers.

The review's terms of reference span adults and children; women and men. It covers the role of the Crown Prosecution Service (CPS), the courts system, prisons and young offender institutions, the Parole Board, the Probation Service and Youth Offending Teams (YOTS) and befitting from access to resources, data and information held by the criminal justice system (CJS) which was not previously available in the public domain for scrutiny and analysis.

It provides detailed, independent analysis of disproportionality and its findings are far-reaching, spanning 108 pages in total, but here we have included some of the most significant:

### Ethnic minority people make up:

**14%**  
OF THE GENERAL  
POPULATION

**25%**  
OF THE PRISON  
POPULATION

**40%**  
OF YOUNG PEOPLE  
IN CUSTODY

### In addition:

ARREST RATES ARE  
**HIGHER**  
FOR ETHNIC  
MINORITY PEOPLE

ETHNIC MINORITY PEOPLE  
ARE MORE LIKELY TO  
**PLEAD NOT  
GUILTY**

ETHNIC MINORITY PEOPLE  
ARE MORE LIKELY TO  
**RECEIVE PRISON  
SENTENCES FOR  
DRUGS OFFENCES**

ETHNIC MINORITY PEOPLE  
**REPORT POOR  
EXPERIENCES  
OF PRISON**

The review explained in its analysis that if ethnic minority people were not disproportionately represented in the UK's criminal justice system, there would be **9,000 fewer prisoners**, the equivalent of **12 average-sized prisons**. The current economic cost of this overrepresentation to our courts, prisons and probation service is estimated to be **£309 million a year**.

## UK Government Ethnicity Facts and Figures Portal: Crime, justice and the law

Since the Lammy Review’s publication, the Ethnicity Facts and Figures website has also highlighted other data regarding policing in the UK.

### Confidence in the local police

- In the year ending March 2020, 74% of people aged 16 and over in England and Wales said they had confidence in their local police
- Every year, a lower percentage of Black Caribbean people reported that they had confidence in their local police than White British people
- In the 3 years from April 2017 to March 2020, a higher percentage of people in the Asian, White, and Other ethnic groups had confidence in their local police than Black people

### Stop and search

- UK-wide, there were 11 stop and searches for every 1,000 people, down from 25 per 1,000 people in the year ending March 2010
- There were 6 stop and searches for every 1,000 White people, compared with 54 for every 1,000 Black people
- Stop and search rates have fallen for every ethnic group since 2009

### Victims of crime

- In the year ending March 2020, 13% of people aged 16 and over said they had been the victim of a crime at least once in the last year. This was down from 17% in the year ending March 2014
- Over a 7-year period, the percentage of White people who said they were victims of crime went down from 17% to 13%
- Men from Mixed ethnic backgrounds (21%) were more likely to be victims of crime than men from any other ethnic group for the 3 years from April 2017 to March 2020
- Asian people aged 75 and over (11%) were more likely to be a victim of crime than White people aged 75 and over (6%)

### Fear of crime

- In 2015/16, around one-fifth of people aged 16 and over in England and Wales believed that they were either ‘very likely’ or ‘fairly likely’ to be a victim of crime in the next year
- Overall, the figures for fear of crime have remained consistent between 2013/14 and 2015/16
- In 2015/16, a smaller proportion of White people reported a fear of crime compared with Asian people, Black people, and those from the Other ethnic group
- Asian people and those from the Other ethnic group had the highest levels of fear of crime

### Reoffending

- Black offenders had the highest reoffending rate (32.7%) in the year ending March 2018 – the rate for White offenders was 30.6%
- Offenders in the Other (including Mixed) ethnic group had the lowest reoffending rate (20.9%)
- In every ethnic group, young offenders had a higher reoffending rate than adults
- White offenders committed the most reoffences per person (4.17 on average)



## Local community engagement: summary of themes

In developing their recommendations, our Criminal Justice Sub-Group completed outreach and community engagement to inform their proposal development process. This engagement took the form of focus groups and open dialogue along with 1-2-1’s with residents and ethnic minority led organisations in Cardiff. This work was led by Race Equality Taskforce member, and Vice-Chair of the Criminal Justice Sub-Group, Marcus Walters, as a local facilitator who is independent of the criminal justice system.

Marcus’ conversations with our local community explored areas of concern and, critically, community solutions to address the issues communities identified. Below, we have summarised the key themes of this dialogue, which formed the basis of further work to develop collaborative solutions across local criminal justice organisations and partnerships:

Theme	Insights
1. Data and transparency	The community highlighted the need for transparent data and opportunities for outsider scrutiny and analysis. This included both data concerning those whose lives are touched by the Criminal Justice System and relevant outcomes and experience data, and data concerning the workforce.
2. Disparity and Disproportionality	This covered broad themes reflecting the complexity and breadth of the criminal justice system, with community members highlighting general trends that they were aware of, such as the overrepresentation of young Black men in the criminal justice system as a whole and in Stop & Search statistics.
3. Hate Crime and Reducing Racial Abuse in Cardiff	Community members highlighted issues around hate crime in recent years and particular trigger points which increased racial abuse, such as the EU referendum, and expressed concerns around the support made available to victims through case work and general holistic support. The need for upstream prevention through improved education-focused approaches was identified and is actioned in one of our earlier recommendations within the Education theme.
4. Cultural Awareness and Anti-Racism Training	Many community members we spoke to highlight the need for additional training for frontline staff working within the criminal justice system. Feedback reflected that this should focus on improving understanding of cultural diversity among different populations of people and building cultural competency skills to interact with people of diverse cultures, especially in conflict management.
5. Representative Workforce	Communities emphasised that the current criminal justice workforce, and particular the police workforce, which is most visible in their communities, was not representative of the community it serves. This was identified as a key area for action to build trust and confidence, but community members highlighted those current perceptions around criminal justice will present complex barriers to ongoing workforce diversification.
6. Youth provision and prevention services	Feedback within this theme reflecting the essential role of youth work, mentorship and diversion opportunities for young people from ethnic minority backgrounds. Our conversations highlighted issues around mental health provision for young people and the reality that young Black people are treated more harshly by the criminal justice system but are more likely than White Groups to access mental health services once within the system. Community members highlighted that mental-health focused prevention should be a local priority for young Black and ethnic minority men. Our dialogue also highlighted the need to align and strengthen youth provision in key parts of the city and provide safe places for young people to meet and ‘just be kids’, with appropriate supervision and safeguards, such as youth centres.
7. Building Relationships and Trust	Community members highlighted that visible and accountable reform was necessary to build trust with ethnic minority communities in the city, particularly the Black community. This was emphasised to need a long term and proactive approach, making ongoing reform and service development efforts and outcomes visible.

**SOURCE:** All data obtained from the UK Government’s Ethnicity Facts and Figures Portal, <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law>

# CRIMINAL JUSTICE: OUR RECOMMENDATIONS

Our recommendations within this theme have been developed working together in partnership with communities, individuals with lived experience and expert organisations, to identify the problems and, most importantly, work together on solutions to address racial disparities in the criminal justice system

As outlined in the introduction to this chapter, local services, satellite offices of UK Government departments and individual police forces do not hold all the levers of change, and this is a deeply complex landscape where we face impact limitations acting alone as a local partnership.

What we have strived to achieve in our recommendations is a clear programme of actions which can be led and delivered locally and contributes to a whole system approach.

Our research indicated that city-orientated action programmes to address racial disparities in the criminal justice system are not well-tested or developed. In the UK context, we could only identify such an approach being taken in London, led by Mayor Sadiq Khan, who chairs MOPAC (the Mayor's Office for Policing and Crime) and is responsible for policing in the capital, giving direction to the Metropolitan Police Service. The approach we are advocating through our recommendations in this chapter is therefore a new one for Cardiff.

Together, the recommendations we have made within this theme can contribute to broader learning across the criminal justice system and inform future service design to prioritise prevention and diversion pathways. Several recommendations concern new major projects which have received temporary grant resources to test new ways of providing support to those on the periphery of the criminal justice system. We encourage service providers to collect robust data, evaluate and reflect on the learning of these projects to inform long-term service design and commissioning approaches. This can only be the beginning.



## 5.1

### RECOMMENDATION:



**Commit to test approaches & collaborate on data exploration at both a local and national level- following the Criminal Justice in Wales approach (formerly All Wales Criminal Justice Board)**

### IN DEPTH:

Collection and publication of data on criminal justice system-civilian interactions gives both institutions and communities the information they need to ensure best practices and eliminate racial profiling. Common-sense data collection on arrests, pleas, trial outcomes, and sentences helps identify the geographic areas and parts of the criminal justice process in need of reform.

The national Criminal Justice in Wales Board have established a Data Task Group to review ethnicity data captured across the criminal justice system in Wales.

Our first recommendation within the Criminal Justice theme is that local criminal justice partners commit to participation and learning during this national review of ethnicity data capture. They should support the

delivery of this important project by sharing local relevant data, and insights into local data practice, as required by the review.

A key area of learning throughout the Lammy Review was the need to strengthen data capture, analysis and transparency across the criminal justice system. Local partners benefit from the aspirations and resourcing of the Criminal Justice in Wales Board to deliver on these recommendations in Wales.

This is an essential first step in understanding the solutions to overrepresentation, evaluating new approaches and delivering accountable and vital changes for ethnic minority communities. As this comes to be achieved ongoing transparency and opportunities for independent scrutiny and challenge will do much to build confidence and trust in criminal justice institutions.



# 5.2

## RECOMMENDATION:



Cardiff’s local criminal justice partnership should develop and invest in tailored or alternative approaches to diversion for ethnic minority groups

### IN DEPTH:

Diversion refers to the strategies that seek to prevent an offender from formal processing by in the criminal justice system. In his 2017 review of racial disparity in the criminal justice system, Rt Hon. David Lammy MP highlighted that disparity in the youth justice system was his ‘biggest concern’. Research strongly indicates that unequal treatment early in the system accumulates into larger disparities downstream.

Our recommendation is that local partners commit to a comprehensive review of diversion approaches and ensure that early-stage prevention and diversion opportunities for children and young people in particular are maximised at a local level.

Diversion itself may be formal, for example requirements for the offender to complete a program as a condition, helping to keep them out of the criminal justice system either entirely or in part. Or informal, including practices such as youth work and mentoring for those at risk of criminal exploitation, work which helps to avoid crime and keeps young people safe.

Diversion can occur at different points within the criminal justice process and community members we engaged clearly expressed their view that diversion is at its best when it is preventing first-time entry to the criminal justice system. This calls for a renewed look at the approach to low-level offending, first time offences and preventative upstream support.

The benefits of this approach are well documented: improving reform and rehabilitation opportunities for offenders, reducing reoffending, reducing stigma and the criminogenic effect of formal processing, lowering costs and reducing the criminal justice caseload.



### Spotlight on: Centre for Justice Innovation

#### Briefing: Youth diversion evidence and practice briefing: minimising labelling

This briefing from the Centre for Justice Innovation emphasises the need to take all reasonable steps to avoid stigmatising children with ‘offender’ labels, and to prevent them from forming deviant identities that may interfere with their development. The briefing highlights that children tend to grow out of crime and that criminal justice processing may in fact increase delinquency through a backfire effect.

Find out more: [www.justiceinnovation.org/sites/default/files/media/documents/2019-09/minimising\\_labelling\\_final.pdf](http://www.justiceinnovation.org/sites/default/files/media/documents/2019-09/minimising_labelling_final.pdf)

#### Equal Diversion? Racial disproportionality in youth diversion

This report highlights that while the evidence strongly suggests that youth diversion is beneficial for the children who go through it, and has been shown to reduce re-offending, inequality in access to, and engagement with, youth diversion is likely to have material impact on disparities later on in the system. The report highlights a number of factors which may impact ethnic minority young people’s access to and engagement with youth diversion including: a climate of mistrust, formal eligibility criteria, a lack of knowledge about the benefits of youth diversion and practitioner perceptions of family engagement. The report also highlights a number of promising practices which we encourage local stakeholders to reflect on how they could be strengthened and incorporated in city practice:

- Workforce cultural competence and inclusion
- MultiAgency decision making and oversight
- Enhancing engagement
- Culturally specific programming
- Empowering Youth Justice Service staff
- Diversion training for defence solicitors
- Evidence-based eligibility criteria

Find out more: [CJI\\_Exploring-disproportionality\\_D\(1\).pdf](http://CJI_Exploring-disproportionality_D(1).pdf) (justiceinnovation.org)



## 5.3

### RECOMMENDATION:



Cardiff's local criminal justice institutions should invest in a comprehensive cultural competency training approach

### IN DEPTH:

Training for frontline staff and decision makers within the local criminal justice system was an issue frequently raised in our engagement with ethnic minority Cardiffians on criminal justice priorities.

The right kind of training will play a crucial role in building capability and understanding across organisations in the criminal justice sector and equip staff with the necessary skills to be active in delivering individual and collective change which will address disproportionality.

Cultural competence means being equitable and non-discriminatory in your practice and behaviour.

It requires a balanced approach to others in which cultural identity and cultural context are understood, respected and taken into account. Like competence in general, cultural competence is the responsibility of both the individual and the organisation.

Our Taskforce recommends that Cardiff's local criminal justice partners commit to develop an appropriate programme of Cultural Competency training and ensure this reaches all tiers of staff from frontline to senior decision makers.

## 5.4

### RECOMMENDATION:



Sustain and develop current efforts to increase workforce representation within the Criminal Justice System and develop a wider approach to addressing representation across the sector, in partnership with the Public Service Board

### IN DEPTH:

It was recognised by our Taskforce that there are ongoing programmes of work to increase ethnic diversity within criminal justice organisations in the city. In particular, there is a significant representative workforce programme being implemented by South Wales Police, but this will take time to demonstrate impact due to the training requirements for newly recruited officers and entrants to the force.

Our recommendation is that these efforts must be sustained with South Wales Police and stepped up across the broader sector. This recommendation

therefore cuts across multiple organisations including Cardiff Council's Youth Justice Service, Her Majesty's Prisons and Probation Service, Ministry of Justice and many others.

This work should encapsulate a broad approach to use new and innovative approaches to attract ethnic minority candidates at recruitment, identify and nurture diverse talent and continue to promote programmes which support positive action and track their progression and success over time.



## 5.5

### RECOMMENDATION:



Cardiff's local Criminal Justice Sector should take part in the Department for Work and Pensions Kickstart Scheme as another means to address workforce representation

### IN DEPTH:

Our fifth recommendation within the criminal justice theme focuses specifically on the recruitment of young ethnic minority people into the criminal justice workforce, as future professionals, decision makers and leaders.

The Kickstart scheme supports young people who are currently unemployed and receiving Universal Credit into work. The scheme offers 6 month paid positions, with appropriate training and support to develop professional skills which provide a gateway to future meaningful employment at the end of the scheme.

We recommend that criminal justice organisations in Cardiff commit to providing appropriate Kickstart placements to young people from Black, Asian and Ethnic Minority backgrounds as a signal of their commitment to increasing workforce representation and to encourage young ethnic minority people to consider future careers within the wide spectrum of roles offered across criminal justice system.



## 5.6

### RECOMMENDATION:



Develop improved mental health service pathways and integrated training and support for police officers as first responders

### IN DEPTH:

Studies highlight that different ethnic groups have different rates and experiences of mental health problems, which reflect their different cultural and socio-economic contexts and access to culturally appropriate services.

For example, African-Caribbean people living in the UK have lower rates of common mental health disorders but are three to five times more likely to be diagnosed with, and admitted to hospital for, schizophrenia.

Research indicates that, in general, people from ethnic minority groups living in the UK are:

- More likely to be diagnosed with mental health problems
- More likely to be diagnosed and admitted to hospital
- More likely to experience a poor outcome from treatment
- More likely to disengage from mainstream mental health services, leading to social exclusion and a deterioration in their mental health <sup>15</sup>

The reasons for this disparity include:

- The impact of migration, including trauma in country of origin, complications in navigating the migration process and hostile responses in host country
- Material and socioeconomic disadvantage, including reduced access to employment and housing
- Experiences of racism and/or exclusion <sup>16</sup>

The Taskforce recommends that further local approaches are developed and tested to keep people out of the justice process where they would be better served by mental health support.

Further service development in this area should include specific consideration of the needs and experiences of ethnic minority groups, recognising the complex and combining disadvantages in mental health service access outlined above.

<sup>15</sup> Findings from the Mental Health Foundation. Available at: <https://www.mentalhealth.org.uk/a-to-z/b/black-asian-and-minorityethnic-bame-communities>

<sup>16</sup> Kane, E. (2014). Prevalence, patterns and possibilities: the experience of people from black and minority ethnic minorities with mental health problems in the criminal justice system. London: Nacro

# 5.7

## RECOMMENDATION:



Develop new mechanisms to strengthen community engagement and voice in the work of the Community Safety Partnership

## IN DEPTH:

Our community engagement exercise found that local ethnic minority residents seek greater insight into the work of the Cardiff Community Safety Partnership and want to understand the mechanisms available to them to engage in the Partnership's work in the city.

Community Safety is complex and multifaceted, covering broad issues from low level anti-social behaviour to tackling serious violence. Therefore, the approach to community engagement will need to balance the risks, threats and harms to the community, alongside the effect this has on perceptions and feelings of safety.

The Community voice is important as it provides an opportunity for the local Community Safety Partnership to understand and respond to community views and experiences.

Community engagement requires skilled and knowledgeable practitioners who can build trust, exchange knowledge with communities and co-produce effective local policy and practice with residents. As with all of our recommendations, this should be delivered with sensitivity and demonstrate understanding towards of the current lack of trust and confidence in criminal justice institutions within some ethnic minority groups.

We recommend that further efforts are made to make the work of the Community Safety Partnership visible for ethnic minority Cardiffians, and that engagement mechanisms are developed to support conversation and dialogue on community safety issues across the Partnership's broad portfolio of work.



© Wales Online (Image: Matthew Horwood)

# 5.8

## RECOMMENDATION:



Support capacity-building with ethnic-minority led voluntary sector groups to strengthen collaboration and delivery within criminal-justice related voluntary sector support services

## IN DEPTH:

Our final recommendation within the criminal justice theme is that mechanisms are developed to support further collaboration between Black and ethnic minority-led organisations and major voluntary sector service providers within the criminal justice sector.

We make this recommendation as there is a lack of ethnic diversity across management positions in Cardiff's voluntary sector, as with the public sector.

This action therefore provides opportunities for mutual skill-sharing and opens dialogue for future service collaborations between ethnic minority-led organisations, which bring particular insight and

expertise into the service needs of ethnic minority groups, and large established organisations with expertise in bid-writing, voluntary-statutory sector partnerships and grant management.

Creating appropriate space for cross-pollination and relationship building will contribute to a collaborative eco-system in the city's voluntary sector which supports the ongoing development of ethnic minority-led organisations. These organisations have much to offer in shaping the city's approach to preventative and rehabilitative services and ensuring they meet the cultural needs of our city.

## Annex 1: Standard ethnic classifications used in the UK

This Report uses the terms “White” and “ethnic minority” in line with guidance from the Office for National Statistics (ONS) for reporting across the UK.<sup>17</sup>

Classifications and terminology have varied between country and over time. Those used here are based on the 2011 Census and the ONS’ recommendations for monitoring surveys.

ONS Recommended Standard Ethnic Categories		
ENGLAND AND WALES	SCOTLAND	NORTHERN IRELAND
<b>White</b> <ul style="list-style-type: none"> <li>English/Welsh/ Scottish/ Northern Irish/British</li> <li>Irish</li> <li>Gypsy or Irish Traveller</li> <li>Any other White background</li> </ul>	<b>White</b> <ul style="list-style-type: none"> <li>Scottish</li> <li>Other British</li> <li>Irish</li> <li>Gypsy/Traveller</li> <li>Polish</li> <li>Any other White ethnic group</li> </ul>	<b>White</b> <ul style="list-style-type: none"> <li>Irish Traveller</li> </ul>
<b>Mixed/Multiple ethnic groups</b> <ul style="list-style-type: none"> <li>White and Black Caribbean</li> <li>White and Black African</li> <li>White and Asian</li> <li>Any other Mixed/Multiple ethnic background</li> </ul>	<b>Mixed/Multiple ethnic groups</b> <ul style="list-style-type: none"> <li>Any mixed or multiple ethnic groups</li> </ul>	<b>Mixed/Multiple ethnic groups</b> <ul style="list-style-type: none"> <li>White and Black Caribbean</li> <li>White and Black African</li> <li>White and Asian</li> </ul>
<b>Asian/Asian British</b> <ul style="list-style-type: none"> <li>Indian</li> <li>Pakistani</li> <li>Bangladeshi</li> <li>Chinese</li> <li>Any other Asian background</li> </ul>	<b>Asian, Asian Scottish or Asian British</b> <ul style="list-style-type: none"> <li>Pakistani, Pakistani Scottish or Pakistani British</li> <li>Indian, Indian Scottish or Indian British</li> <li>Bangladeshi, Bangladeshi Scottish or Bangladeshi British</li> <li>Chinese, Chinese Scottish or Chinese British</li> <li>Any other Asian background</li> </ul>	<b>Any other Mixed/Multiple ethnic background</b> <ul style="list-style-type: none"> <li>Asian/Asian British</li> <li>Indian</li> <li>Pakistani</li> <li>Bangladeshi</li> <li>Chinese</li> <li>Any other Asian background</li> </ul>
<b>Black/ African/Caribbean/ Black British</b> <ul style="list-style-type: none"> <li>African</li> <li>Caribbean</li> <li>Any other Black/African/ Caribbean background</li> </ul>	<b>African</b> <ul style="list-style-type: none"> <li>African, African Scottish or African British</li> <li>Any other African</li> <li>Caribbean or Black</li> <li>Caribbean, Caribbean Scottish or Caribbean British</li> <li>Black, Black Scottish or Black British</li> <li>Any other Caribbean or Black</li> </ul>	<b>Black/ African/ Caribbean/ Black British</b> <ul style="list-style-type: none"> <li>African</li> <li>Caribbean</li> <li>Any other Black/African/ Caribbean background</li> </ul>
<b>Other ethnic group</b> <ul style="list-style-type: none"> <li>Arab</li> <li>Any other ethnic group</li> </ul>	<b>Other ethnic group</b> <ul style="list-style-type: none"> <li>Arab, Arab Scottish or Arab British</li> <li>Any other ethnic group</li> </ul>	<b>Other ethnic group</b> <ul style="list-style-type: none"> <li>Arab</li> <li>Any other ethnic group</li> </ul>

**SOURCE FOR TABLE: ONS: Ethnic Group, national identity and religion**

<sup>17</sup> ONS, Language and Spelling – Race and Ethnicity, <https://style.ons.gov.uk/house-style/race-and-ethnicity/>

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## **Race Equality Taskforce Terms of Reference**

### **Purpose**

1. The Race Equality Taskforce ('the Taskforce') is established by Cardiff Council, following a decision by the Council's Cabinet on 16 July 2020, to enable the coordination of meaningful and evidence-led actions and recommendations to address racial discrimination and promote race equality in Cardiff.
2. The Taskforce will undertake this work until the end of the current political administration and local government elections in May 2022.

### **Objectives**

3. The Taskforce will work to the following objectives:
  - Work with Cardiff's communities and organisations to improve and prioritise race equality to achieve an inclusive, cohesive, thriving and representative city;
  - Guide Cardiff's policy and strategy developers to make sure race equality is included in all of their work;
  - Use the Council's convening power to advance race equality in the public, private and voluntary sector, working closely where required with the Cardiff Public Services Board;
  - Coordinate actions and recommendations to advance race equality, focusing on priority work-streams, identified in consultation with the city's ethnic minority residents;
  - Report on progress on race equality and the general impact of inequality and discrimination on the ethnic minority communities of Cardiff.

### **Priorities**

4. The following areas have been identified to be considered by the Taskforce:
  - a) Employment and Representative Workforce
  - b) Education and Young People's Experience of Services
  - c) Citizen's Voice
  - d) Health and Social Care
  - e) Criminal Justice
5. The priorities of the Taskforce have been informed by public consultation with Cardiff residents and agreed by the Race Equality Taskforce Membership at their inaugural meeting on 2<sup>nd</sup> December 2020. A work stream will be established for each of the agreed priorities, which will coordinate and consider strategic evidence, practice and policy reviews in order to produce recommendations for action.

## Reporting Requirements

6. The Taskforce will report to Cabinet on each work-stream on a quarterly basis from March 2021. The formal report will be provided annually to Council. Work Stream's a) Employment and Representative Workforce b) Education and Young People's Experiences of Services c) Citizen's Voice will provide recommendations which will be considered at Cabinet. Work stream d) Health and Social Care will provide recommendations to the Health Board for consideration. Work stream e) Criminal Justice will provide recommendations for the Community Safety Partnership.
7. The Taskforce will also provide an annual report to Full Council, in line with the reporting schedule for the Council's statutory Equalities Annual Report.
8. A Cross-Party Group will provide Members input and engagement for the Taskforce.

## Limitation of Authority

9. The Taskforce is an advisory body to the Council's Cabinet. It is not a decision-making body and does not have the authority to:
  - Expend money on behalf of Cardiff Council;
  - Commit Cardiff Council to any arrangement;
  - Direct Cardiff Council staff in the performance of their duties and shall not seek to do so;
  - Purport to represent Cardiff Council in any communication with the public or media; and
  - Consider any matter outside its Terms of Reference.
10. The actions of the Taskforce or any of its members shall not fetter the discretion of the Council in the exercise of any of its functions.

## Membership

11. The Taskforce will comprise of the Chair and up to 14 members. Seeking to ensure a diverse range of protected characteristics are recognised within the Taskforce.
12. Members will be appointed until the end of the current political administration and local government elections in May 2022.
13. The membership will be made up of individuals with insight and interest in race, ethnicity and human rights and who have the ability, experience, opportunity and influence to make changes in their sector, industry and institutions or organisations.
14. Membership of the Taskforce is to be selected following a public appointment process openly advertised by the Council. The membership is selected in order to achieve a balance of representation across the following fields:



Voluntary Sector and Community Organisations	Public Services
Major Employers and Small-to-Medium Sized Enterprises (SMEs)	Culture and the Arts
Education, including Further and Higher Education	Sport
Trade Unions	Children and Young People

15. The Taskforce will also have the ability to co-opt members on a consensual basis.
16. Members of the Taskforce must submit, upon appointment, a declaration of personal interests, including a declaration that they understand and will abide by the Nolan Principles of Standards in Public Life. All members will strive to be respectful, consensus-oriented, transparent and accountable.
17. Everyone in attendance at Taskforce meetings must declare any actual or potential conflicts of interest; these shall be recorded in the minutes. Anyone with a relevant or material interest in a matter under consideration must be excluded from the discussion; this shall also be recorded in the meetings.

### **Chair**

18. The appointment of the Chair of the Taskforce is a matter for decision by the Council's Cabinet.
19. The Chair will be appointed until the end of the current political administration and local government elections in May 2022.
20. The Chair is responsible for chairing meetings of the Taskforce and promoting the work of the Taskforce.
21. The Chair will also oversee the activities of the work-streams and strategic activities associated with tackling discrimination and disadvantage faced by ethnic minority residents in Cardiff.

### **Vice Chair**

22. The Vice-Chair of the Taskforce will be selected by the Chair from among the 14 members who are publicly appointed to the Taskforce.
23. The Vice-Chair will be appointed for 6 months subject to reappointment.
24. The Vice-Chair will deputise in chairing meetings of the Taskforce in the absence of the Chair.

### **Meeting Arrangements**

25. The Taskforce will be quorate at 25% of the total voting members, rounded up to the nearest whole number. This must include the Chair/ Vice-Chair.

26. Meetings of the Taskforce will take place on a quarterly basis (i.e. every 3 months) and will usually take place at a council venue or will be held remotely using Microsoft Teams due to the Covid-19 pandemic.
27. Members of the Taskforce are expected to make every effort to attend all meetings and attendance will be recorded formally through minutes of the meetings.
28. Where members are unable to attend Taskforce meetings, any apologies should be given to the Chair and/or meeting secretariat in advance of the meetings. Substitute delegates are not able to attend meetings without the prior approval of the Chair (or Vice-Chair in the absence of the Chair).

### **Recommendations and Voting**

29. Draft recommendations will be brought to the Taskforce meetings through work streams, organised by number (eg: 1.1, 1.2) and will be recorded in the meetings minutes along with any votes. Recommendations are called to a vote by the Chair of the Taskforce during a meeting. Approved recommendations from Taskforce meetings will be reported to Cabinet.
30. Votes may be cast by Taskforce members only and not Council secretariat or observers. Votes are made only by the members present in a properly arranged meeting.
31. Decisions will be made by a majority of the votes cast at the meeting. In the event of there not being a clear majority vote, the Chair shall have a casting vote.
32. Votes are cast at the Chair's discretion and are as follows:
  - I. *By General Consent* -- When a recommendation is not likely to be opposed, the Chair says, "if there is no objection ..." The membership shows agreement by their silence, however if one member says, "I object," the item will then be put to a vote by one of the methods below.
  - II. *By Voice* -- The Chairman asks those in favour to say, "Aye", those opposed to say "no". Any member may move for an exact count. (Whilst meeting virtually during the Covid-19 Pandemic the 'raise hand' function on Teams will be used)
  - III. *By Roll Call* -- Each member answers "yes" or "no" as his name is called. This method is used when a record of each person's vote is required.

### **Confidentiality**

33. Confidentiality rules are as follows: The Taskforce will adhere to the Chatham House Rule, anyone who comes to a meeting is free to use information from the discussion but is not allowed to reveal who made any comment. Failure to adhere to this rule may result in taskforce membership being revoked.

## Administration

34. The Secretariat and administrative support services to the Taskforce will be provided by Cardiff Council, or an individual or organisation appointed by Cardiff Council, and will include meeting organisation, circulating meeting agendas, taking meeting minutes and overseeing general Taskforce administration.
35. All final papers/reports must be submitted to the meeting secretariat 7 clear days in advance of the meeting.
36. The agenda and supporting papers shall be forwarded to each member of the Taskforce 3 clear days in advance of the meeting.

## Communications

37. The Taskforce will communicate via email using a private invite-only list of contacts. Communication may include:
- Periodic updates concerning Taskforce activities;
  - Dissemination of minutes and initiatives;
  - Links and research related to Taskforce aims and ambitions; and
  - Draft documents for review and comment.

## Press & Social Media

38. Council secretariat are available for any queries. However, confidentiality rules should be adhered to during all public or social correspondence. Further guidance on this can be found in the 'Communications Guidance' provided by the Equality Team.

## General Requirements

39. In so far as it relates to the activities of the Taskforce, the Taskforce and individual members of the Taskforce:
- i. Will use all reasonable endeavours to comply with all applicable requirements of Cardiff Council's Welsh Language Scheme and the Welsh Language (Wales) Measure 2011 ("the Measure") and the Welsh language standards issued to the City of Cardiff Council (Compliance Notice – Section 44 Welsh Language (Wales) Measure 2011) insofar as it relates to the activities of the Taskforce. A copy of the Welsh language standards is available from: [www.cardiff.gov.uk/bilingualcardiff](http://www.cardiff.gov.uk/bilingualcardiff)
  - ii. Will comply with any and all requirements under the Data Protection Legislation and shall not disclose or allow unauthorised access to any confidential information provided or acquired during the term of the Taskforce.
  - iii. Shall not unlawfully discriminate within the meaning and scope of any law, enactment, order, or regulation or good practice relating to

discrimination (whether in age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity or otherwise).

- iv. Acknowledges that the Council is subject to the requirements of the Code of Practice on Government Information, Freedom of Information Act and the Environmental Information Regulations and shall assist and cooperate with the Council to enable the Council to comply with its Information disclosure obligations, and
- v. Shall not behave in a manner so as to bring Cardiff Council into disrepute.

#### **Amendments to the Terms of Reference**

- 40. The Terms of Reference may be amended, varied or modified in writing by the council's Head of Policy and Partnerships in consultation with the Chair, with advice from Legal Services.
- 41. Taskforce members will be given the opportunity to comment on any proposed substantive changes to the Terms of Reference, so far as reasonably practicable, and the Council will ensure that Taskforce members' views are duly taken into account.

Date: 9 March 2022

Councillor Saeed Ebrahim,  
Chair, Race Equality Taskforce,  
Cardiff Council,  
County Hall  
Cardiff  
CF10 4UW



County Hall  
Cardiff,  
CF10 4UW  
Tel: (029) 2087 2087

Neuadd y Sir  
Caerdydd,  
CF10 4UW  
Ffôn: (029) 2087 2088

Dear Councillor Ebrahim,

### **PRAP Scrutiny Committee 8 March 2022: Race Equality Taskforce Report**

Thank you for presenting the Report of the Race Equality Taskforce (RET) to the Policy Review and Performance Scrutiny Committee on 8 March 2022. As Chair, I wish to pass on the appreciation of all Members of the Committee to yourself, to the Cabinet Member for Housing & Communities, Councillor Lynda Thorne representing the Leader, and to officers Gareth Newell, Sian Sanders, and Charlotte Amoss for supporting effective engagement with scrutiny.

The Committee welcomes the Report of the RET, acknowledging that it is a foundational blueprint capturing the work of the taskforce over the past 18 months, and creates a starting point that shapes the Council and partners' aspirations for serving the one in five Cardiff residents with an ethnic minority background. Members have asked that I convey their comments and observations to inform discussion as you take the Report through Cabinet and Full Council. The 3 recommendations of the Committee following the scrutiny are also listed at the end of this letter.

#### **Governance**

The Committee found nothing to disagree with in the Report, we consider it sets out clearly the high level aims to improve lived experiences of ethnic minority residents. However, the governance arrangements for oversight of progress going forward are unclear in the Report. Specifically, we were unclear as to whether the Cabinet would be responding to the recommendations in the report. We note your response that the first point of accountability will be the Public Services Board and that this is an update report, and a more formal response will be expected in the summer.

We note your intention that monitoring any actions will be dealt with as a part of the corporate policy programme We suggest a key role for Scrutiny will be to monitor the

delivery of action plans that develop out of the recommendations within the Report, particularly those commitments made by the Council. We therefore note your offer to return with proposals as to how the governance and accountability arrangements may work in the summer of 2022 and we **recommend** that governance arrangements are outlined in more detail in the formal Report.

### **Action plans**

We note your conviction that the recommendations set out in the report are achievable, however, given that the challenge requires a partnership approach and will need to be embedded in partners' plans, Members are keen to establish when action plans will emerge to deliver the recommendations, whether there will be KPI's that enable us to monitor progress and whether the Committee will be afforded the opportunity of scrutinising the plans. Again, we look forward to more clarity on this.

### **Role models**

The Committee notes from data, presented on pages 26/27 of the Report, analysing the Council's workforce by grade and ethnicity, that most ethnic minority employees are in lower paid jobs. We recognise that the Report makes recommendations to address this issue, but we consider this data is a wakeup call and the Council has a role to play in ensuring PSB partners are on board. We wish to stress that there needs to be a shift across the city, with organisations asking why more senior roles are not held by ethnic minorities. The city needs ethnic minority role models, and we **recommend** that the Council leads the shift, starting by encouraging its Operational Managers of ethnic backgrounds to become ambassadors and mentors.

### **Reflecting the population of Cardiff**

Members were encouraged that ethnic minority staff from the BAME community currently constitute 10.26% of the workforce at Cardiff Council, representing an increase from 9.87% in 2020. However, this is clearly still lower than the 15% of ethnic minorities that make up Cardiff's population. We note there is work to be done in raising the confidence of ethnic minorities to apply for Council jobs, that workshops have started at Council Hubs, and it is important to raise expectations from an early age. We urge a campaign that portrays the Council as a good employer for ethnic minorities and that the action plan for Theme 1 specifically addresses this imbalance in the Council.

The Committee was unanimous in commending this Report to the forthcoming new Administration of Cardiff Council. We consider it a valuable starting point for actively dealing with the challenge of equality for black and ethnic minority Cardiffians and, as such, we **recommend** that the new Administration takes forward its proposals as a firm basis for developing action plans.

<b>Recommendation</b>	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Implementation Date
That you ensure the final Report, to be produced in summer 2022, includes detail as to the governance arrangements for oversight, accountability and monitoring of progress.				
That the Council leads in the pursuit of ethnic minority role models for the city, starting by encouraging its own Operational Managers of ethnic minority backgrounds to become ambassadors and mentors.				
That the new Administration of Cardiff Council takes forward the proposals of the Cardiff Race Equality Taskforce as a firm basis for developing action plans.				

Once again, on behalf of the Committee, I thank you for bringing the work of the Taskforce to the Committee, and I commend your achievements to date. I will also be commending the value of closely monitoring progress on your recommendations to my successor and I wish you well for the future.

Yours sincerely,



**COUNCILLOR DAVID WALKER  
CHAIR, POLICY REVIEW AND PERFORMANCE SCRUTINY COMMITTEE**

cc Members of the Policy Review & Performance Scrutiny Committee.  
Councillor Ramesh Patel, Chair, Environmental Scrutiny Committee.  
Councillor Lynda Thorne, Cabinet Member Housing & Communities.  
Councillor Huw Thomas, Leader, Cardiff Council.  
Gareth Newell, Head of Performance and Partnerships.  
Sian Sanders Operational Manager, Cohesion and Community Engagement.  
Charlotte Amoss, Policy Officer.  
Andrea Redmond, Committees Support Officer.  
Mr David Hugh Thomas, Chair, Governance & Audit Committee.  
Chris Pyke, OM Governance & Audit.  
Tim Gordon, Head of Communications & External Relations.  
Jeremy Rhys, Assistant Head of Communications and External Affairs.  
Debi Said, Cabinet Support Officer.  
Joanne Watkins, Cabinet Office Manager.



**SWYDDFA'R ARWEINYDD  
OFFICE OF THE LEADER**

Fy Nghyf / My Ref: CM48478

Dyddiad / Date: 14 October 2022



**Neuadd y Sir**  
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Appendix 4b

Councillor Joel Williams  
Chair  
Policy Review & Performance Scrutiny Committee  
Cardiff Council  
County Hall  
Cardiff  
CF10 4UW

Via email: [Nicola.newton@cardiff.gov.uk](mailto:Nicola.newton@cardiff.gov.uk)

Annwyl/Dear Joel,

**PRAP Scrutiny Committee, 8 March 2022: Race Equality Taskforce Report**

Further to correspondence sent by the former Chair of the Policy Review and Performance (PRAP) Scrutiny Committee earlier this year, I have been asked to respond to you, as the current Chair, on behalf of Councillor Saeed Ebrahim and the Race Equality Taskforce.

I know that they welcomed the invitation to attend the former PRAP Scrutiny Committee in March 2022 and the positive feedback that was received from the Committee on the report of the Race Equality Taskforce. They also valued the support and interest of elected members in meeting the recommendations of the Taskforce and successfully delivering this important initiative for our city.

As Leader of the Council, I have noted the recommendations made previously by the former PRAP Scrutiny Committee, which were supported by the Race Equality Taskforce, and I am content to accept them.

I can also confirm that the administration will be accepting all of the recommendations made by the Taskforce. A report outlining the Council's response to each of the recommendations is expected to be considered by the Cabinet in December 2022. The intention is that related actions will form part of the delivery plans of relevant directorates in-year, as well as our corporate planning and performance framework in 2023/24.

I have also asked that the Race Equality Taskforce is reconvened in summer 2023 and undertakes an assessment of the implementation of its recommendations to date.

**GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI**

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

**WORKING FOR CARDIFF, WORKING FOR YOU**

The Council welcomes correspondence in Welsh, English or bilingually. We will ensure that we communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to delay.



I look forward to updating you and the Committee on the Council's response to the Race Equality Taskforce's recommendations in the months ahead.

Yn gywir,  
Yours sincerely,

A handwritten signature in black ink, appearing to read 'Huw Thomas', written in a cursive style.

**CYNGHORYDD / COUNCILLOR HUW THOMAS  
ARWEINYDD / LEADER  
CYNGOR CAERDYDD / CARDIFF COUNCIL**

**ONE PLANET CARDIFF – ANNUAL REVIEW**

**CLIMATE CHANGE (COUNCILLOR CARO WILD)**

**AGENDA ITEM: 3**

**Reason for this Report**

1. To note progress on the One Planet Cardiff Strategy and associated Carbon Reduction analysis.
2. To introduce a standardised methodology to model a pathway to net zero by 2030, and
3. To approve the refreshed action plan in light of the new Administration's ambition for a Stronger, Fairer, Greener City.
4. To set out the initial steps that the Council is taking in response to the Motion agreed by Full Council in September 2022 on Climate Change and Climate Justice.

**Background**

5. We are in the early stages of a man-made climate crisis, with severe consequences for humanity and future generations around the world, including Cardiff. The over-heating of the planet's atmosphere has been caused by the unsustainable use of the earth's resources, and particularly by the associated carbon emissions.
6. Cardiff cannot shy away from the fact that our citizens emit more carbon than the world's average and as the capital city of a developed nation have helped profligate an environmentally unsustainable economy.
7. The current and future risks to humanity from these threats include:
  - Rising sea levels will submerge currently inhabited land and increase the likelihood of flooding
  - The climate will get progressively more unstable with storms and heatwaves increasing in regularity and intensity
  - Global heating is making some parts of the world uninhabitable, leading to the displacement of millions of people
  - Drought, storms and changes to the weather seasons impact farming and global food production, leading to food shortages and price increases

8. Whilst it is likely that poorer and hotter parts of the world will be more seriously impacted, as an inter-connected global city, Cardiff will also feel the impact of these threats directly and indirectly.
9. We know it would be almost impossible to reverse climate change, but if cities and nations around the world act now we can stop the impacts from getting far worse.
10. The Council declared a climate emergency in 2018 and then published its strategic response to this in the One Planet Cardiff (OPC) Strategy in 2021. One Planet Cardiff established two overarching goals:
  - for the Council to be Carbon Neutral in its activities by 2030, and
  - to work in partnership with stakeholders to develop a pathway for a Carbon Neutral City by 2030.
11. Since then, significant progress has been made by the Council and key partner public sector organisations in identifying the key high impact priorities for action that need to be focussed on, developing a robust programme for change, and starting to make tangible carbon reduction improvements.
12. The Council's internal policy position has also strengthened over the intervening period. The approval of the new Administration's "Stronger, Fairer, Greener" strategy places Climate Change at the centre of the Council's agenda.
13. Full Council debated and passed a Motion in September 2022 around climate justice and the impact of climate change on nations around the world, many of which produce far fewer emissions than more developed nations. The motion calls on the council to commit to being a 'globally responsible city' and also reinforced the commitment to acknowledge and tackle the global consequences of climate change. The One Planet Cardiff Strategy and Action Plan set out a number of the steps that the Council will take to respond to the Motion.
14. This report is the first review of the OPC Strategy. It records the progress that the Council has made so far, both in striving to reduce the climate implications of our actions and to build greater resilience to the effects of climate change that we're already experiencing.
15. The report updates and adds detail to the programmes, projects and actions that will deliver these overarching goals. Details of the OPC strategy and how it was developed can be found at [www.oneplanetcardiff.gov.uk](http://www.oneplanetcardiff.gov.uk). A summary of the main point of progress across the OPC action plan is provided in the Appendix to this report and discussed in more detail below.
16. As part of the Welsh Government's ambition for a Carbon Neutral public sector in Wales the Council's operational emissions are calculated annually and submitted to WG. The findings of this first annual Operational

Carbon Analysis are also discussed, along with carbon statistics produced by Central Government relating to the city as a whole. This reporting provides the basis for the monitoring of our progress against the One Planet Cardiff 2030 target.

## Issues

### ***Analysis of the Council's Annual Operational Carbon Emissions***

17. The 2021 One Planet Cardiff Strategy reported the Council's estimated carbon emissions at a 2019/20 baseline year, alongside an analysis for 2020/21. This was to ensure that the One Planet Cardiff carbon baseline related to "normal" pre-pandemic activities, so as not to be skewed by the various implications of the Covid lockdowns.
18. The key recognition from that analysis was that the carbon emissions "caused" by the Council's procurement activities dwarfed all other types of more direct emissions from heating and powering buildings and from our travel and mobility activities (referred to at the time as "Scope 1" and "Scope 2" emissions, with "Scope 3" referring to indirect (or "caused") emissions). However, some significant issues with the overall methodology – defined nationally - for calculating procurement emissions were noted at the time <sup>1</sup>.
19. Since then, the Welsh Government carbon reporting framework methodology has been amended. This year's reporting has shifted focus from the Scope 1, 2 and 3 approach, to "activity" based reporting under the headings of:
  - Buildings
  - Fleet
  - Business travel, commuting and homeworking
  - Waste
  - Land based emissions and sequestration
  - Renewables
  - Supply chain (procurement)
20. As this presents a more meaningful subdivision, which relates more directly to the OPC themes and action plan, officers have reworked the 2019/20 and 2020/21 data using this methodology and have used this to form the basis of the analysis for this report.
21. However, this changed methodology means that direct comparison between the current reporting year and the Council's published baseline is difficult<sup>2</sup>. Therefore, in order to ensure that the first year's progress is

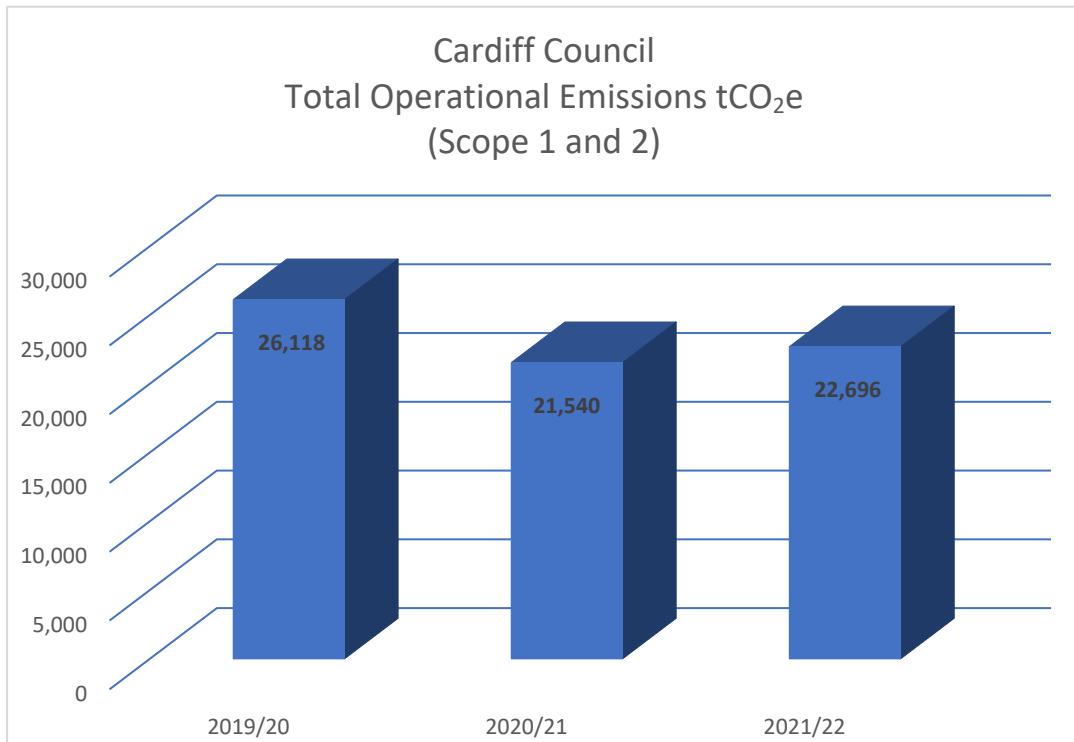
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<sup>1</sup> See [www.oneplanetcardiff.co.uk](http://www.oneplanetcardiff.co.uk) for a fuller explanation of the 2021 Carbon Reporting methodology and terminology

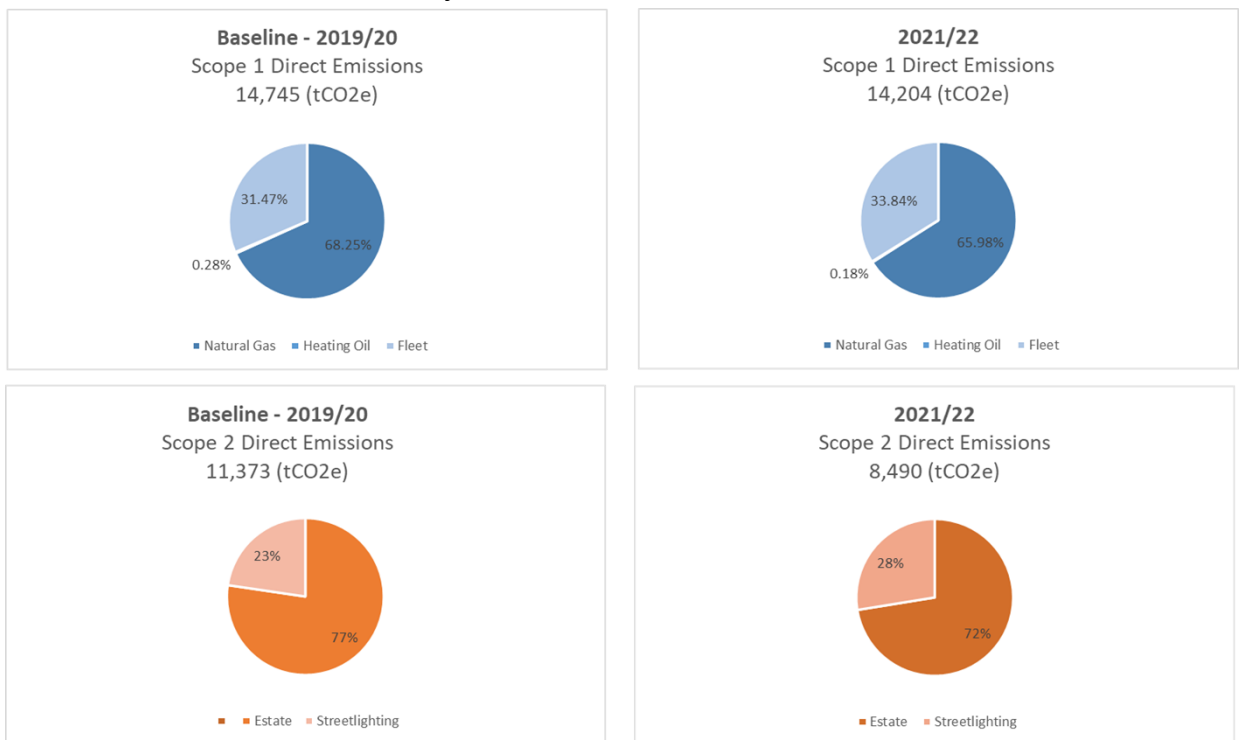
<sup>2</sup> In particular, the current WG methodology includes some "well-to-tank" emission factors, which have been used to account for the upstream emissions associated with extraction, refining and transportation of the fuel sources to an organisation's site (or asset), prior to combustion. These were considered to be external/caused emissions in the 2019/20 baseline

properly recorded we have also included an analysis based on the original methodology to ensure a like-for-like comparison as follows.

22. Excluding Scope 3 emissions this analysis showed that the Council's direct operational emissions (Scope 1 + Scope 2) reduced from 26,118 tonnes CO<sub>2</sub>e to 22,695 tonnes between 2019/20 and 2021/22. This represented a 13% reduction with the majority of this observed in electricity consumption. The charts below give further details.



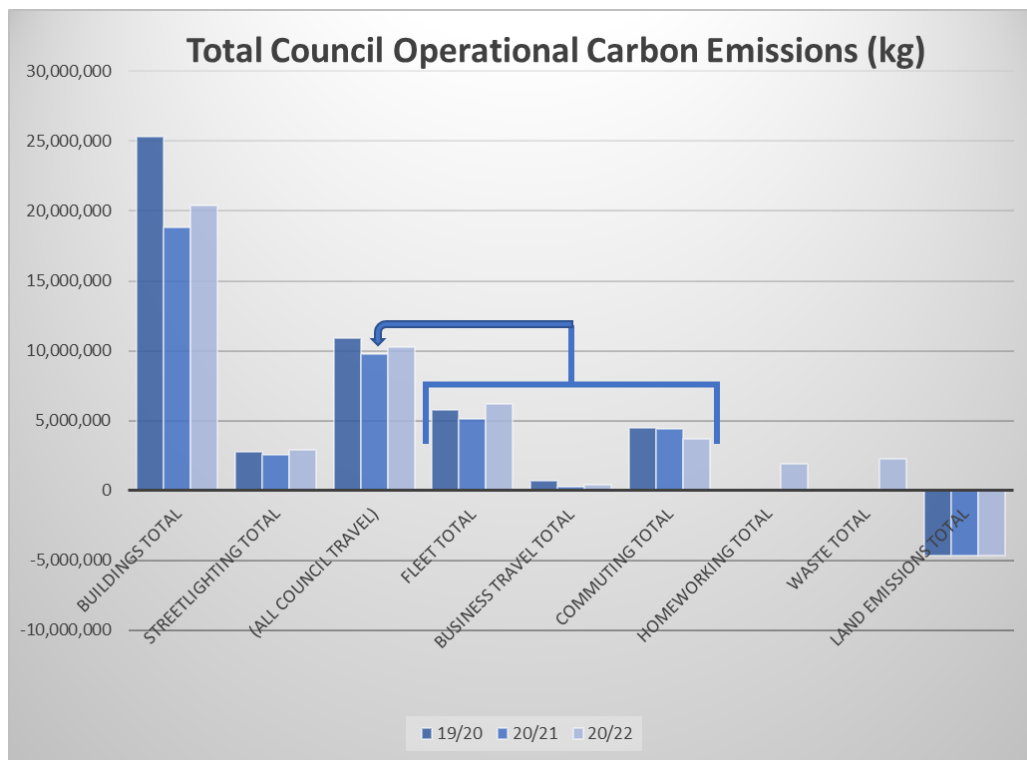
23. The more detailed analysis that now follows is based on the new WG



calculations. See this link [Welsh Public Sector Net Zero Carbon Reporting Guide \(gov.wales\)](https://gov.wales/government/welsh-public-sector-net-zero-carbon-reporting-guide) for a fuller explanation of WG's methodology.

reporting methodology. Overall, it is important to understand the current data in the light of the highly abnormal circumstances associated with the Covid Pandemic, as well as changing accounting methodologies. In particular, the figures show a “bounce-back” from the pandemic year as activities resumed, and now include the “upstream” emissions not previously counted, along with some new elements attributable to waste and homeworking as described below. on that basis the detailed analysis is not directly comparable with the original OPC report the general trend and observations are consistent.

24. The chart below shows how emissions (calculated with the new WG methodology) changed over the last three years on an “Activity” basis.
25. Excluding the emissions from the Supply Chain/Procurement category the Council’s operational Carbon Emissions reduced by 4% between the 2019/20 base year and 2021/22.



26. Building emissions reduced by an overall 18% over the three year period but with a slight (8%) increase in the year 2020/21-21/22, This increase was expected, and reflects the reopening of key buildings post-lockdown, but overall the downward trend was still strong. The majority of the decrease was observed in electricity consumption with gas emissions (largely associated with heating) still relatively slow to decarbonise.
27. Street Lighting emissions increased slightly over the period, though the figures disguise some significant work done on the Council’s programme of LED replacement and dimming work. In particular, a large element of this work was completed prior to the 19/20 base year, delivering a 50% carbon reduction in treated areas. A worldwide shortage of electronic equipment then slowed progress over the Covid period with work only able

to resume at pace in late 21/22 and meaning that the data associated to the latest work is not fully captured in the report. On that basis it is anticipated that a more significant impact will register the next reporting year. It should also be noted that the moderate increase during the 21/22 year is likely to be the result of new street lighting being added to the baseline figure as new roads in new developments were adopted

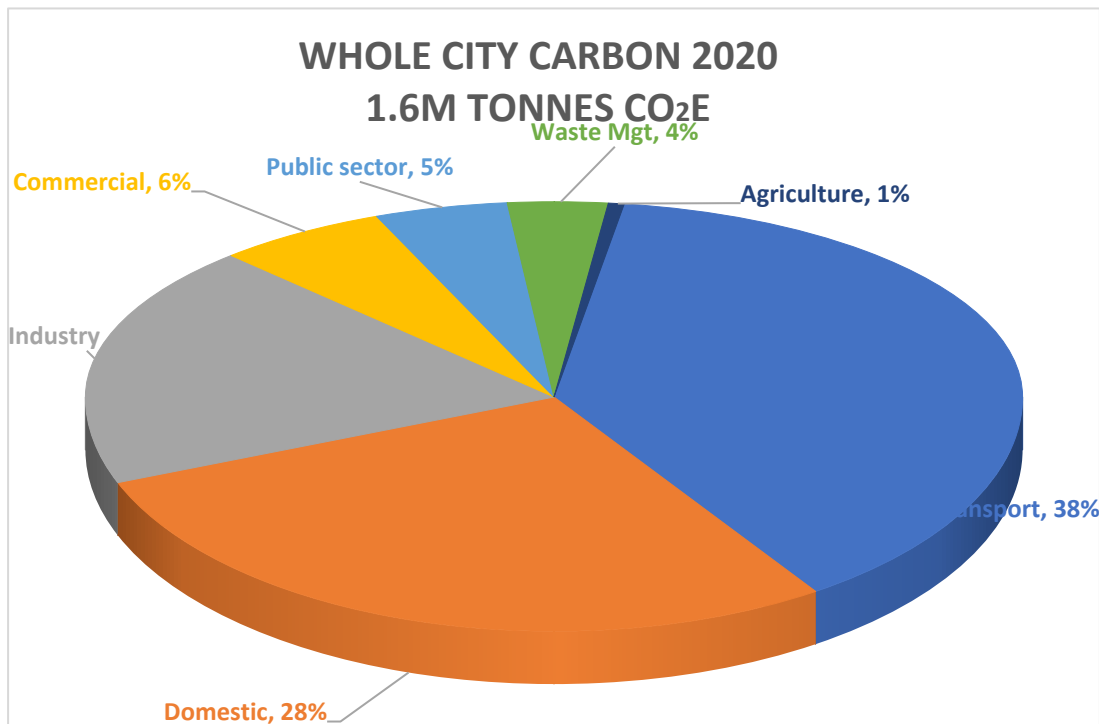
28. The Council's commuting emissions reduced by 17% since the baseline year, with the downward trend persisting through the reporting period. Business travel also decreased, reflecting the significant uptake of on-line meetings across the organisation.
29. The figures for "Land Emissions" show the effects that trees and green infrastructure on the Council's land have in capturing, or sequestering carbon thus having a positive effect on carbon reduction. The static figures disguise some positive progress made in extending our tree canopy since the true effects of new planting aren't captured until the trees start to mature.
30. Three key factors were noted in this analysis which held back some otherwise positive progress:
  - Emissions from our fleet increased, partly because of the Council's Covid protocols which limited or prevented vehicle sharing and therefore triggered more individual trips. This situation is expected to be rectified in the current financial year now that most of these restrictions have been lifted;
  - For the first time, the report includes emissions caused by our practice of asking people to work from home (i.e. estimates of the carbon costs of heating and powering private residences are now included); and
  - Due to a breakdown of one of the waste processing plants in the city a small element of our waste needed to be sent to landfill in 2021/22. Though this was for only a brief period, with the issue now fully rectified, the associated emissions for the year were recorded and included in the analysis. Additionally, the WG methodology now attributes a small portion of the waste processing emissions at the first point of processing for all non-landfill waste streams.
31. Supply chain or procurement emissions still account for the huge majority of the Council's operational carbon footprint but as noted, the methodology used for assessing this complex area has significant limitations. WG are aware of this limitation and have instigated several pieces of work aimed at improving the analysis framework. In view of the current limitation of this methodology it is proposed to hold back on a detailed response until a more accurate and reflective approach is adopted. It is still recognised that Procurement remains the biggest source of operational emissions and is therefore a central pillar of our One Planet Cardiff strategy. The Procurement team have made significant progress in work to understand the Council's supply chain footprint and to identify the highest carbon spend areas. Cabinet has also approved a new "Socially Responsible



Procurement Strategy” which has carbon, climate change and circular economy as central themes.

### Analysis of Cardiff’s City-wide Emissions

32. Central Government’s Department for Business Energy and Industrial Strategy (BEIS) estimates and publishes carbon emissions at a local authority level annually. These figures relate to calendar years and the latest available data relates to 2020. These figures showed that emissions across the entire City boundary (i.e. relating to all citizens, organizations and visitors in the city) stood at 1.6 million tonnes, representing a reduction of 12% since the 2019 1.8m Tonnes recoded in the 2019 base year. The chart below shows how this is distributed amongst the key sectors in the city.



33. Transport remains the highest emitting sector for the city, contributing 607,900 tonnes of city emissions in 2020. This had reduced by over 20% from 749,000 tonnes CO<sub>2</sub> in 2019. Domestic emissions were the second highest, accounting for 469,800 tonnes CO<sub>2</sub> in 2020, with a more modest decrease of 2.3% since 2019. These observations are likely to have been affected by the lockdowns in 2020 with fewer people travelling and more people working from home.

34. The table below gives more details of the distribution of emissions for key sectors, and how these changed over the two reporting periods. They particularly reflect the need for a strong and collaborative focus across the city on the decarbonisation of Transport, Domestic heat and power, and industry, and this data is shaping the Council’s response to the climate emergency.

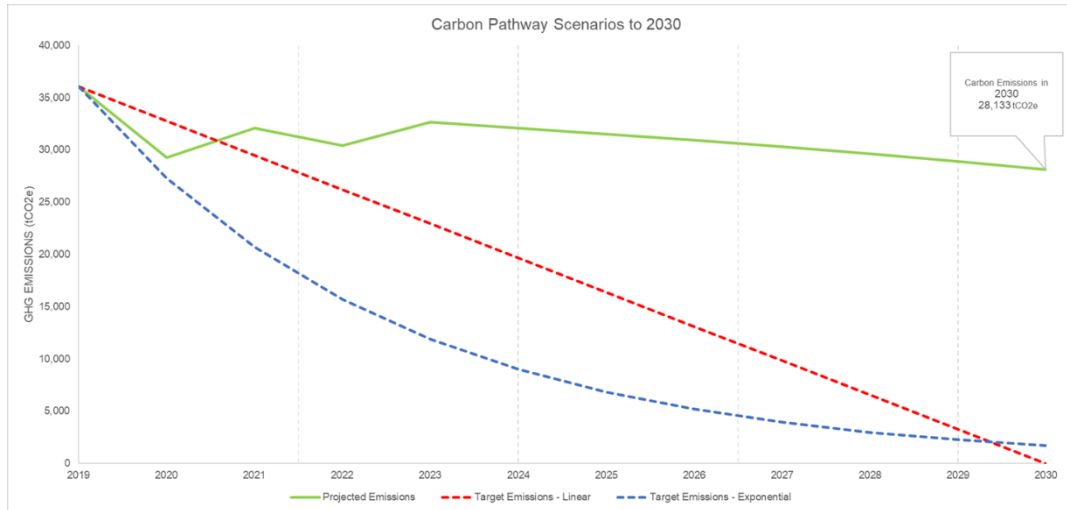
% Of City-Wide Carbon Emissions by sector (Source: BEIS)

	Transport	Domestic	Industry	Commercial	Public sector	Waste Mgt	Agriculture
2019	41%	26%	17%	7%	5%	4%	1%
2020	38%	29%	17%	6%	5%	4%	1%

**Modelling the Impact of our Projects and Plans – a ‘Pathway to Net-Zero’**

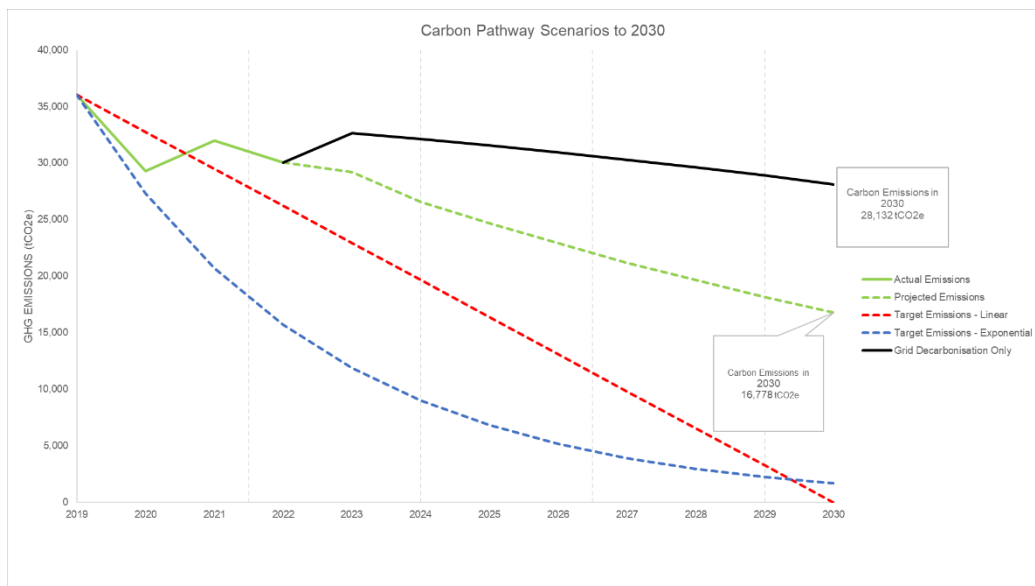
35. Since the approval of the One Planet Cardiff Strategy significant progress has been made in developing and enhancing methodologies to model and predict the impacts of current and future projects and programmes. This is a crucial step and defines a so-called **Pathway to Net Zero**. It will assist in clearly tracking progress and to set meaningful interim targets for the remainder of the decade. It will also allow us to understand the gaps and challenges in the programme at the earliest opportunity and will assist in decision making and prioritisation of projects across all our activities.
36. The current focus of the work is on the Council’s operational carbon and the initial project impact modelling done for the 2021 OPC report has been used as the basis of the work. A methodology has been developed that can show graphically how known and approved projects will affect the bottom line of the Council’s carbon emissions, when these will impact over the years to 2030, and what all of the projects will achieve in aggregate. In doing this the model shows the gaps that are left and allows new or amended project proposals to be examined for their potential impacts.
37. The model includes assumptions about grid decarbonisation (effectively the “do-nothing” scenario of waiting for renewable energy provision to increase nationally) and can adapt in the event that baselining and carbon reporting methodologies change.
38. Currently, procured goods and services (Scope 3) emissions have not been captured in the pathway as the methodology and guidance for calculating emissions and setting target is under review.
39. The chart below shows the progress to date (reflecting data discussed in the sections above) and then projects a “do nothing” scenario, relying solely on national predictions for grid decarbonisation. The resulting green line <sup>3</sup>is then compared against two target lines showing where the Council needs to be in the journey to net zero (one linear (in red) with approx. 10% reduction per annum, and the other exponential (in blue) which would involve deeper and more impactful interventions earlier on in the timeline). The gap between the green and red lines effectively represents notional annual targets for carbon savings.

<sup>3</sup> This methodology takes the current actual/observed annual emissions data between 2019/20 and 2021/22 and uses the projected emissions conversion factors as issued by BEIS in 2021. Grid decarbonisation has actually occurred at a rate faster than shown in the BEIS 2021 projected conversion factors and explains the apparent increase in emissions in 2023. This is not an increase in overall emissions, but an adjustment as forecast emissions (which are higher than the actual recorded levels) take over from actual ones.



40. Taking this as the base position the model then allows our various decarbonisation projects to be added, based on their anticipated carbon reductions over time. This then causes the green line to descend, showing the individual and collective impacts of the OPC programme. The graph below is an example which includes the following known projects:

- building decarbonisation (according to the currently approved Estate Decarbonisation Plan (which is being reviewed))
- a transition to a low emission fleet.
- full replacement of all streetlighting to LED, and
- a tree planting and biodiversity programme under the banner of Coed Caerdydd



41. Limiting our actions solely to these projects still leaves an anticipated carbon gap of 20,566 tCO<sub>2</sub>e in 2030, illustrating the scale of the additional challenge that faces us.

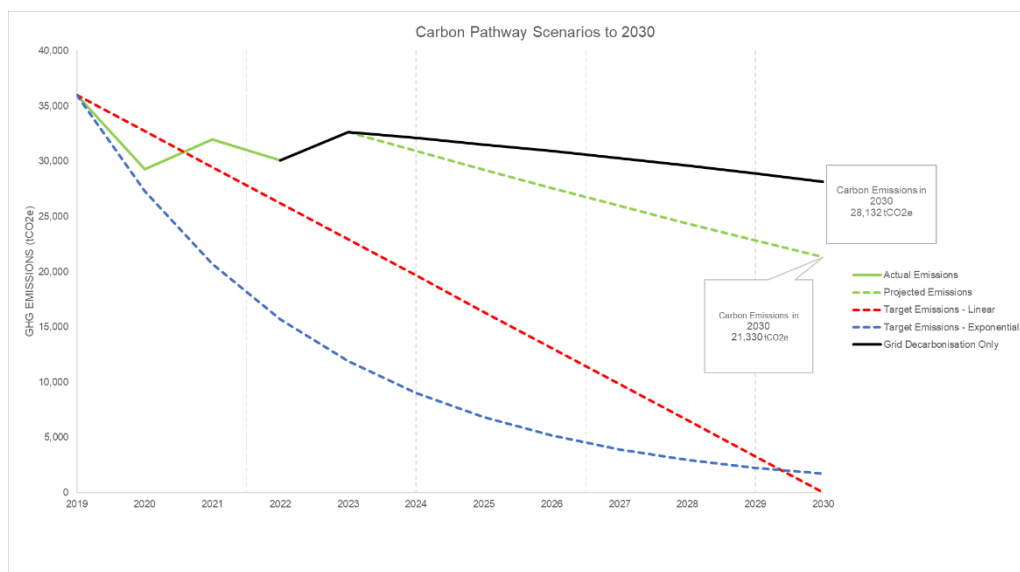
42. This methodology has been used to underpin and inform our refresh of the OPC action plan. The remainder of this report focuses on successes, and challenges experienced to date in each of our key areas of work and recommends areas of focus and acceleration over the next period of our work.

**ACTION PLAN REVIEW - Buildings:**

43. The way in which we all heat and power our buildings in the UK is still heavily dependent on high carbon fossil fuels. Emissions from the Council’s buildings, schools and offices are the single largest element of its direct carbon footprint, whilst emissions from all of the domestic properties across Cardiff in the city are responsible for close to a third of the carbon footprint of the city as a whole. Across the sector, there have been some very significant carbon reduction outputs experienced through the decarbonisation of the electricity grid but carbon from heating, which remains dominated by gas, is still a major challenge.

**Council premises:**  
**(Carbon Neutral Council action)**

44. The Council has a long track record of addressing energy efficiency in our operational estate and, alongside national grid decarbonisation, has already reduced our building’s carbon emissions from over 40,000 tonnes in 2014/15 to just over 18,000 tonnes in 21/22 (excluding leisure centres).
45. The Council’s current Estates Decarbonisation Plan includes an approved target to remove 60% of carbon emissions by 2030. The graph below shows what this scenario does to the Pathway analysis model. It is clear that the approved plans are not enough and so the strategy is being reviewed, looking for opportunities for deeper decarbonisation.



46. We know that the remainder of the journey to 2030’s Carbon Neutral goal remains challenging. Many of the initial easy options have already been instigated (LED replacement bulbs etc), however the vast majority of

required work in regards to scale and resource still lies ahead. This will need to address much harder problems, especially around large scale / estate wide refit, insulation, the removal of fossil fuels from our heating systems, and the need to increase renewable electricity supplies in line with growing electric heat demands.

47. In response, the Council has already:

- Instigated a programme of smart monitor installations and energy performance benchmarking tools in key buildings to develop a much better understanding of how they perform;
- Focussed on a series of roof mounted Solar proposals to support and decarbonise on-site electricity requirements;
- Commenced a pilot scheme to install an air source heat pump in one of our existing schools, joining some solar generation, energy efficiency measures and smart building controls at the site, to develop prototype for net zero retrofit;
- Commissioned work to design one of our new-build schools to Net Zero standards as a pathfinder for all future School construction;
- Published a position statement on the Council's own new buildings which requires all commissions from 2024 onwards to be designed to net zero carbon standards; and
- Commissioned a study, drawing from the above data and pilots, to advise on a fully costed programme of retrofit activity across the whole estate over the rest of the decade.

48. This work will culminate in a proposed new Estates Carbon Reduction plan that will present targets, costs, options and delivery models for the Cabinet to consider as part of the One Planet Cardiff strategy's 2030 ambition. The outputs from this study will inform the contribution that buildings will make to the net zero target and indicate the scale of capital investment required.

***Domestic Premises:  
(Carbon Neutral City action)***

49. On a city-wide scale Domestic energy efficiency is an ever-more significant issue with spiralling fuel prices central to the current cost of living crisis. The Council has been working on domestic energy efficiency schemes for many years but is now gearing up to escalate this work significantly by:

- Procuring a scheme to upgrade all council owned low-rise blocks of flats;
- Continuing to apply for and implement Welsh Government grant funded domestic retrofit schemes;
- Working with Cardiff Capital Region to support an additional scheme targeting Energy Company Obligation ( ECO) funding towards households in fuel poverty.

50. One Planet Cardiff set a target of retrofitting 2,000 homes per year using these and any other emerging opportunities by 2024<sup>4</sup>.
51. Forty new build Council Houses are also under construction which have been designed to near Zero carbon standards, with solar PV, ground source heat pumps and electric boilers and a local energy management plan to optimize the linked energy systems. These properties are due for completion in 2023 – setting a standard for new Council homes going forward. These form the exemplar scheme in a wider programme delivering over 1,100 new homes (Council and privately owned) which are already exceeding national standards for energy efficiency.
52. Although this activity collectively marks good progress, the work will be limited to certain fuel poor and Council owned categories of housing and the target won't reach the majority of the City's other domestic properties. Whilst the Council cannot hope to directly tackle all properties that fall outside of these limitations, it is in a central position to highlight the issues, to lobby for co-ordinated policy and partnership action, and to signpost residents to reliable information and support.
53. More than any other area in the climate and decarbonisation agenda, this issue represents an obvious opportunity for clean economic growth, and new skills and business development, with possibly close to 8-10,000 homes per year estimated to be in need of some sort of energy efficiency upgrades in the city over the next decade.
54. Active discussions on this agenda have taken place over the last 12 months, at the local, City Region and National Level, and it is important that these reach a defined conclusion soon. A nationwide retrofit scheme is desperately needed and the Council is gearing up to lobby for and help to deliver this.

***City Scale Building Decarbonisation  
(Carbon Neutral City action)***

55. The Council is also working on this building decarbonisation agenda a City-Wide scale and in a partnership context:
  - Our Climate Emergency Board (CEB) has brought together major public sector, academic and utility organisations in the city, each of which also has an active decarbonisation plan in place, to share and encourage best practice. A specific CEB sub-group has now been established to focus on our collective endeavours to decarbonise the city's public estate; and
  - Our Planning and Building Control service is also working hard to deliver local and national policy for near zero carbon buildings. The replacement Local Development Plan is also being shaped to have sustainability and climate change as a central driving force. A position statement on the current policy context and expectations for new development was

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<sup>4</sup> This category of decarbonisation falls outside of the Council's direct operational carbon footprint and so isn't included in the Pathway analysis.

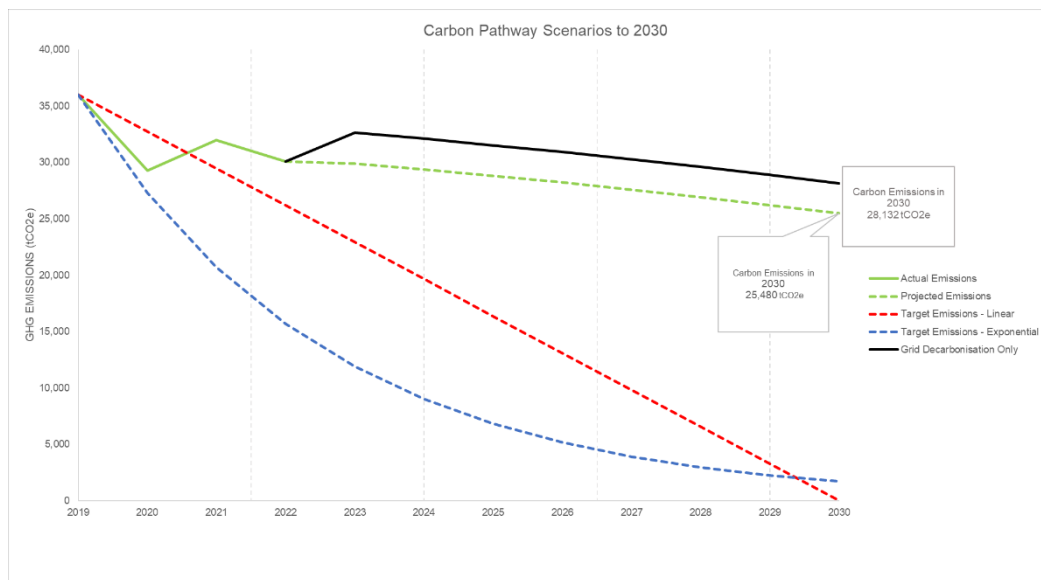
published in 2021. Success in this area will need the co-operation and partnership of developers in the city to ensure that new development does not add to our carbon and climate challenges. New development needs to be fully engaged with climate concerns and ready to help deliver the low carbon vision of One Planet Cardiff.

**ACTION PLAN REVIEW - Mobility**

- 56. Government figures estimate that emissions associated to transport account for 38% of the City’s carbon footprint, making it the highest impacting sector. The Council’s own transport activities (including fleet vehicles, staff business travel and staff commute) represent its second largest operational carbon cost with an estimated 10,000 tonnes of CO2 emitted in 21/22 – equivalent to half of the emissions attributed to our buildings.

**Council Mobility  
(Carbon Neutral Council action)**

- 57. The Council’s Fleet Transition Action Plan is actively examining the operational mobility footprint of all service areas. It sets out a target to transition the Council’s fleet of vans, car and refuse collection vehicles to electric Vehicles (EV). To date, 53 of the Council’s fleet vehicles are now electric with the remainder due for replacement by 2025 ( subject to a review of the current program which is underway in light of current shortages of vehicles nationally). This includes 10 new electric refuse collection vehicles which are now operational. The graph below shows the anticipated impact of full fleet decarbonisation over the remainder of the decade.



- 58. The way in which the Council uses “grey fleet” – where staff use their own cars on Council business - is also being examined for opportunities to decarbonise. Carbon emissions arising from this reduced by a dramatic 45% over the period 2019/20 to 2021/22. This is likely to be reflective of a significant increase in on-line meetings triggered by the lockdown but there

was an upward trend between 20/21 and 21/22 which needs to be carefully considered and understood.

59. Carbon emissions associated with staff commute have reduced by 17% between 2019/20 and 2021/22. This is assisted by current hybrid/home working arrangements which are still in place in many parts of the Council. However, a very large number of our staff, especially in Schools, Communities and Waste services, still need access to places of work.
60. The issues around Council mobility are complex, touching on HR policy for travel, diverse operational needs in different service areas, our future proposals for hybrid working, our strategic estates strategies, and especially on staff's own personal choices around travel mode and car purchasing. Reflecting this complexity the Council has set up a task and finish group, bringing together major stakeholders across the Council to develop an action plan for the remainder of the decade which can then be assessed and included in our Pathway model. As well as looking closely at our operational needs and hybrid working policies to reduce unnecessary journeys, we'll also be rolling out a range of staff incentivisation initiatives to encourage greater modal shift to active/low carbon travel.
61. Though hard to quantify, transport emissions caused by our procurement activities through deliveries and distribution are likely to exceed this direct operational total.

### **Citywide Mobility** ***(Carbon Neutral City action)***

62. The way in which we all move around our city for work and leisure is already on a low carbon trajectory, supported by the actions set out in the Transport White Paper and Low Emission Transport Strategy. Progress to date includes:
  - An ambitious programme of traffic calming measures and cycling infrastructure provision which is well underway;
  - A fleet of 36 electric buses which is now in operation throughout the city and the Council is seeking to increase this through grant funding provided by the Welsh Government by 2023;
  - The council is working with the Burns Delivery Unit on active travel, bus and rail improvements between Cardiff and Newport on a Newport Road corridor;
  - The council is working with Transport for Wales on integrated ticketing with the first phase bus and rail trial planned between Cardiff and Newport in 2023 to 2024
  - Proposals for electrification of the railways in the city are well advanced including further funding decisions on the South Wales Metro;
  - a series of 20 miles per hour zones is in place throughout the city and the Council is working with the Welsh government under the roll out of the national 20 mph scheme in Cardiff by September 2023;



- work with schools on safety and active travel continues and will be scaled up in line with the “one Planet Schools” pledge initiative referred to in paragraph 105 below.
  - The installation of over 70 publicly accessible EV charging posts in residential areas and public car parks with plans for a continued roll out of these being developed; and
  - A Cardiff Capital Region funded electric taxi initiative which will enable taxi drivers to trial EV taxis to aid in their future purchase and investment decisions.
  - A road user charging scheme to reduce the number of cars coming into the city centre is also under consideration
63. However, it is critical to note that this good work will also need to be supported by public campaigns and information aimed at encouraging and supporting people and businesses to make healthier and more environmentally sustainable travel choices and this will form a major part of our Behaviour Change strategies discussed below.
64. The Council is also working with partner organisations across the city who are known to have very similar mobility challenges, to investigate how combined and aligned actions may help to drive deeper carbon savings and enhance transport management across Cardiff. Our Climate Emergency Board has established a specific Fleet and Mobility sub-group to look into opportunities for collaboration and this is soon to report on some joint EV procurement, collaborative EV charging and co-ordinated staff behaviour change proposals.
65. Overall, the imperative is clear for us to all reduce the number of unnecessary motorised journeys in the city, to enable healthier and more environmentally sustainable active travel modes, and to support a transition to low carbon fuels for any remaining journeys.

**ACTION PLAN REVIEW - Supply Chain and Procurement**  
**(Carbon Neutral Council action)**

66. Notwithstanding the reporting difficulties described earlier, emissions arising indirectly from the Council’s procured goods and services are known to account for for well over 80% of operational carbon impact. This area of work has therefore been subject to significant analysis and review over the past year and all staff involved in specifying, sourcing, awarding and managing contracts have a key role to play in finding solutions.
67. The Council’s Socially Responsible Procurement Policy 2022-27 has been refreshed and was approved by Cabinet in October 2022. The strategy now has carbon reduction as a central theme and, alongside national guidance, will take a stepped approach to ensuring that the Council understands and aims to reduce the carbon consequences of the goods and services it procures, as well as engaging with and encouraging our suppliers to understand and reduce their carbon impacts. Welsh Government guidance is seeking to require all suppliers for major procurements to have an approved climate change strategy in place and to begin to signal, and then require that tender evaluation starts to favour

low carbon purchasing alongside value for money and other social responsibility issues.

68. The Council is also identifying some of our very high carbon spend areas and conducting analysis of these to help understand issues and solutions moving forwards.
69. Meanwhile, there has been some proactive work on a range of specific procurements to pilot lower carbon outcomes in the Council. In particular a recent road resurfacing scheme contained a central specification for the contractor to use recycled, low carbon materials. Large parts of North Road have now been resurfaced with materials derived from waste processing residues and the scheme has been accredited as having low /zero carbon credentials.
70. Other schemes, such as the recent contracts to build a net zero high-school and to roll out LED lightbulbs across all of the city's street lighting, show how low carbon can and will form a central consideration in our purchasing activities moving forward.
71. Moving forward, it is clear that staff in the Authority with responsibilities for procurement will need upskilling to be able to identify and then seek to drive down the carbon impacts of the goods and services that the Council purchases. A programme of carbon literacy and circular economy training is being developed and piloted and will start to roll out over the coming year.
72. It also needs to be recognised that not all of the Council's suppliers, especially the smaller independent and local ones, will be able to move to low carbon solutions at pace and we need to consider how our purchasing activities can support the transitions needed.
73. In order to set a target for reducing emissions from our supply chain the Council will need to review reporting boundaries for priority contracts and hot spot spend areas, to estimate what emissions target needs to be in 2030 if Cardiff is to become a Carbon Neutral Council. This will require engagement with our suppliers and work on their ability to provide us with accurate data. The Council is awaiting the outputs from Welsh Government and the WLGA to inform appropriate carbon modelling methodologies and approaches to target setting.
74. There is an increasing recognition of the key role that procurement can play in tackling some of the greatest challenges facing our Communities and the Planet as a whole.
75. To achieve this it is crucial that these challenges are considered at each stage of the procurement cycle which means that all staff involved in specifying, sourcing, awarding and managing contracts have a key role to play. It is particularly important that adequate attention and time is invested in the planning and contract management stages.

**ACTION PLAN REVIEW - Waste and Recycling**  
**(Carbon Neutral City action)**

76. Wales is amongst the leaders in the world on its waste and recycling record and the Council has had acknowledged success in virtually eliminating landfill and increasing recycling activities in the city.
77. The recording of associated carbon benefits is complex as waste or recycling material handed to third parties then enters separate processing procedures which attract their own footprint calculations. For that reason WG requires us to limit calculations to any waste that goes to landfill (which is usually zero in the Council's case), along with some limited transfer activities in handing waste streams over.
78. This, however, disguises some of the very positive carbon reduction activities that are associated with our Waste operations. Recycling helps reduce greenhouse gas emissions by reducing energy consumption. Using recycled materials to make new products reduces the need for virgin materials. This avoids greenhouse gas emissions that would result from extracting or mining virgin materials. In addition, manufacturing products from recycled materials typically requires less energy than making products from virgin materials.
79. Waste prevention and smart shopping are even more effective at reducing greenhouse gas emissions that result from energy consumption. When we use less or reuse products more, less energy is needed to extract, transport and process materials to manufacture products. Purchasing products made from recycled materials, such as paper, plastics, and metal, instead of virgin materials also helps to reduce energy consumption.
80. The high rate of household recycling in Wales saves over 400,000 tonnes of CO<sub>2</sub> per year from being released into the atmosphere and further accelerating climate change. In 2020/21 Cardiff is estimated to have avoided 36,000 tonnes of CO<sub>2</sub> emissions. There is a clear message, that all disposal options create an impact on the environment in terms of climate change and that the recycling of materials provides a net benefit.
81. To drive further benefits the Council's Waste Service has recently produced an improvement Action Plan in its recycling strategy which is targeting a range of behaviour change and education areas to:
- Increase Recycling Participation and Capture
  - Increase opportunities to recycle
  - Improve the material quality of recycling sent for re-processing and
  - Encourage and support the prevention, reuse and repair of materials.
82. A data modelling exercise has also been undertaken which should help us to create better local estimates of the carbon benefits arising. More detailed information on the Council's waste activities can be found in the following link: [https://myrecyclingwales.org.uk/local\\_authorities/cardiff](https://myrecyclingwales.org.uk/local_authorities/cardiff) .

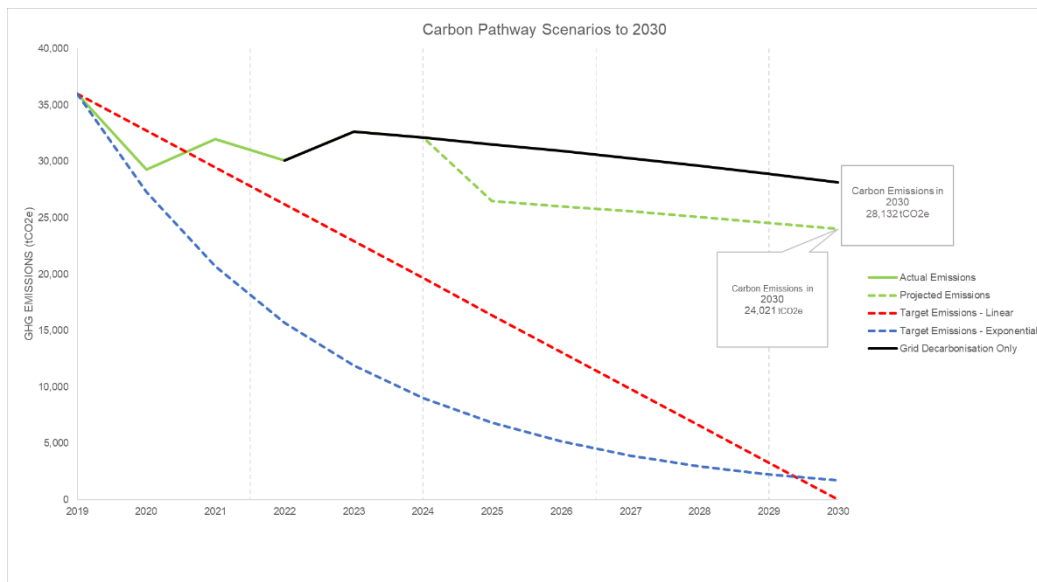
83. Linked to this, the Council has joined forces with Cardiff Metropolitan University and Celsa Steel UK to work with businesses and schools within the Council's boundary to network and develop a deeper understanding of circular economy principles and practices. To date, this Cardiff Circular Economy Network project has delivered seven workshops and engaged with 12 schools. These sessions provided educators with tools to embed circular economy principles across the curriculum, supporting the sharing of resources and the development of new lesson plans.

**ACTION PLAN REVIEW – Energy**  
***Renewable Energy Generation and Low Carbon Energy Distribution***

84. It is now well established that the overall electricity demand for both the Council and the city will increase towards 2030 and beyond. Even with a huge effort to reduce electricity consumption through energy efficient lighting, appliances and electrical goods, the new demands created from electric vehicles and new heating technologies will grow much faster as the Country moves away from fossil fuels . It is critical that this growing demand is met by clean renewable energy sources and the Authority has a key role to play in achieving this locally.

**Energy**  
***(Carbon Neutral Council action)***

85. The Council has installed many roof mounted Solar PV and hot water systems in the last decade and this approach needs to be fully embedded in our building retrofit projects moving forward, accommodating onsite needs as far as possible and reducing demand on the grid.
86. Moving forwards Officers are now scoping out two new renewable energy generation schemes to be delivered on Council Land and with the potential to generate to almost 25MW of clean, renewable power for the city.
87. Business cases are currently being assembled for Cabinet consideration next year. If acceptable, one of these two schemes could help to provide zero carbon power for a significant proportion of the Council's energy demands at its recycling depot, including power for our new Waste Vehicle fleet. The graph below estimates that the potential carbon impact of this single proposal in the Pathway analysis could be highly significant. There is still much work to do to develop these technical and business cases but the scheme already illustrates how linking new renewable generation directly to our operational energy demands holds the potential for step-change decarbonisation where the prevailing local opportunities are favourable.



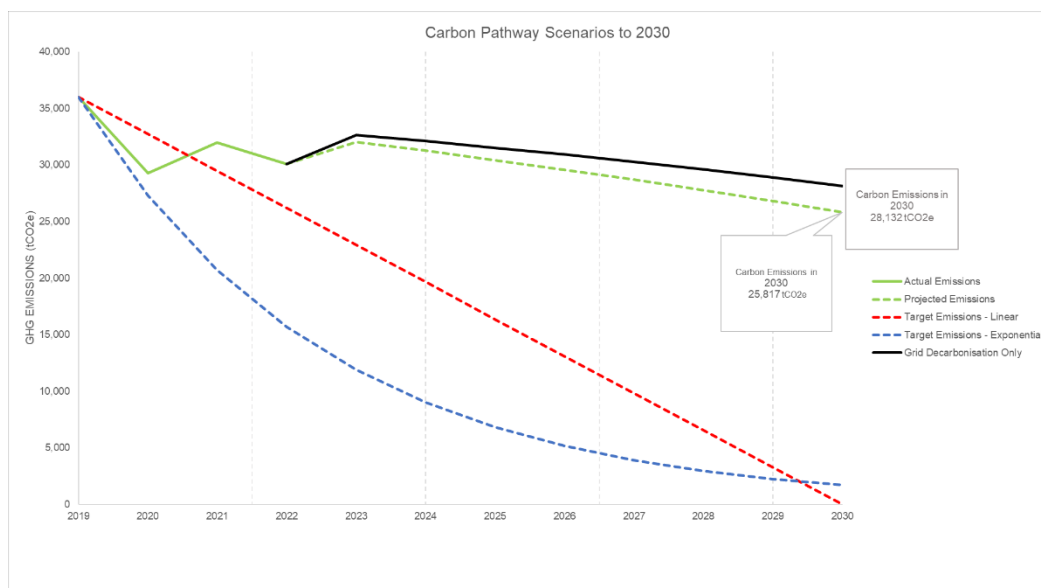
## Energy (Carbon Neutral City action)

88. As a major landholder in the City the Council also has a potential role in supporting wider grid decarbonisation for the city and region and a whole. Our 8.9 MW solar farm scheme at Lamby Way has been commissioned, providing the equivalent zero carbon energy to power over 2,000 homes. The energy is currently being used, via a direct off-grid connection, to help achieve low/zero carbon operations at the City’s waste-water treatment works as well contributing to wider grid decarbonisation.
89. The Cardiff Heat Network is also now under construction with first “heat-on” dates anticipated in late 2023. Though not considered to be renewable energy the heat that will be distributed to customer buildings has a very low carbon content as it is a by-product of the separate waste processing operation much of which would otherwise go unused. Customers will see an immediate 80% average reduction in their carbon emissions compared to traditional gas heating systems and it is estimated that the project will deliver a city-wide carbon reduction of well over 9,000 tCO<sub>2</sub>e per annum once complete. The scheme offers the additional benefit of providing heat without significantly increasing electricity demands associated with other types of low carbon heating.
90. At a significantly larger scale the Council is also supporting work at the City Region and in the Western Gateway Group of local Authorities to re-examine the case for tidal power generation in the Severn Estuary. This work is at a very early stage but has significant interest and support from regional partners in the public and academic sectors and could be a game changer for renewable energy in Wales.

**ACTION PLAN REVIEW - Green Infrastructure and Adaptation to Climate Change**  
**(Carbon Neutral Council and City action)**

**COED CAERDYDD**

91. The One Planet Cardiff Strategy highlighted the need to increase the city’s tree canopy and reshape our land management techniques to protect and enhance biodiversity. The Coed Caerdydd project is now well established as a tool to help to deliver these aspirations. Urban tree planting is known to have more immediate positive impacts on air quality and cooling than increasing canopy cover in woodland and forests and so this project is also reaching out to partner organisations in the city who are also starting to identify parts of their estates on which to host Coed Caerdydd planting. By 2024, 22 hectares will have been planted with additional trees and other planting, supporting carbon sequestration and providing additional urban shading and cooling. The final target for the Coed Caerdydd project is to plant 839 hectares though it should be noted that current funding is only secured July until 2023. A bid has been made to the Councils Shared Prosperity Fund for an additional 2 years of funding which is critical to the continuation of Coed Caerdydd. The graph below shows this impact that the delivery of the full scheme could bring to the Council’s operational footprint. This measures only the activity that the project does on council owned land, though the totality of the work, which will need to extend to other land ownerships, will be larger.



**Flood Defence**

92. Our flood defence programme is also becoming well established and, drawing inspiration from our Greener Grangetown work, many of the City’s new developments, public realm improvements and traffic calming schemes are now including Sustainable Urban Drainage design. As well as mitigating and adapting to extreme weather incidents, these schemes help to reduce the power demands otherwise placed on the sewage

system to pump and cleanse storm water. The schemes also brings enhanced biodiversity opportunities to our urban areas.

93. The Council has a statutory duty as the Lead Local Flood Authority (LLFA) to adopt a flood risk strategy and management plan. The existing strategy and plan have been in place since 2014 and 20115 respectively but a refreshed combined emerging strategy and management plan is being developed. This strategy will include community engagement and community adaptation to climate change and the resultant flood risk, from coastal, river and surface water flood events. The Council as The Suds Approval Body under its statutory duties as the LLFA is working with NRW to improve the water quality across the city and in particular within the city's 3 rivers – this will improve biodiversity as well as mitigate against flood risk.
94. Coastal flooding is one of the major risks to Cardiff from climate change. The FRAW (Flood Risk Assessment Wales) modelling has shown that the Rhymney estuary is at significant risk from fluvial and coastal flooding. The council has designed a scheme to strengthen the defences through rock-armour, sheet piling and embankment works with a 100 year design life offering protection against the 1 in 200 year flood event. The tender process began in October 2022 and construction is expected to commence by the end of March 2023.
95. The BEIS City wide emissions report referred to above captures the positive “sequestration” benefits of our green infrastructure and estimated that this was removing 4,000 tCO<sub>2</sub>e from the city in 2020. However this is unlikely to have picked up the detail of the recent activities mentioned above.

### **ACTION PLAN REVIEW - Food**

96. The Cardiff Food Strategy 2021-24 promotes healthy, local and low carbon food. With the appointment of a dedicated officer for food, there is now a wide range of food initiatives well into delivery that will contribute to One Planet Cardiff. Activity underway in our schools is gathering momentum, engaging with pupils, the community, and local SMEs.

### **Council Food (*Carbon Neutral Council action*)**

97. The Council's school's food programme captures the efforts for production of food on school grounds and the provision of healthy, sustainable food choices in our schools. The Edible Schools programme has delivered 15 vegetable gardens, with a further 10 to be installed this financial year. Options for school-based food co-operatives are being explored and potential partners will be identified to develop a pilot scheme.
98. Free school meals provision to all pupils requires significant investment in both kitchen and menu provision. 18 schools have had kitchen

improvement works during the summer, increasing to 40 schools by Christmas 2022. A scope of works for appointing a consultancy to develop the new low carbon, sustainable and healthy menu has been produced. The new menu will be developed with dietetic and carbon modelling experts.

99. A pilot project for County Hall Canteen has been delayed due to internal changes within the Council and timing of getting staff back into County Hall on a hybrid working model. Work is ongoing with Facilities Management to consider options for delivery. Healthy, low carbon food choices are to be reflected in council food procurement, with initial discussions underway.

***City-wide Food  
(Carbon Neutral City Action)***

100. The Council is also engaged with a number of food projects across our Cardiff Food Network group and, in particular, is working on a pilot project to test ways in which spare and underused plots of land in Council ownership can be made available to local community groups for healthy, local, lower carbon food growing initiatives' etc.
101. The Council has also launched a major food innovation project in partnership with Monmouthshire Council and the Cardiff City Region. This £2.5m project is being run as a competition seeking innovative solutions to increase the local production and supply of healthy, low carbon and environmentally sustainable food in the region. Successful projects will help to increase the quantities of locally produced food consumed in the region and to stimulate sustainable supply chains and jobs in a food economy that is currently over-dependent on imported and processed foods.

***ACTION PLAN REVIEW – Behaviour Change – engagement and partnership***

102. Delivering the One Planet Cardiff vision, both for a carbon neutral Council by 2030 and for the production of a detailed “pathway” to net zero for the whole city, will require the efforts of everyone living and working in the Cardiff and officers have been tasked with developing a far reaching programme of Behaviour Change support to help facilitate this.

***Council Staff Engagement  
(Carbon Neutral Council action)***

103. At the Council’s operational level, embedding low carbon principles across the Council requires a governance structure that holds each directorate accountable for delivery of the interventions within the action plan and ensuring that future decision making has the lowest possible impact on carbon emissions. As mentioned above Procurement Officers have started to develop relevant carbon spend statistics on a Directorate level, our Estates team have recognised the need to support behaviour change in building



managers to target wasted energy use, and work has also begun to support low carbon travel choices for our staff.

104. Recognising the complex cross-cutting issues involved in this agenda officers have also now added a formal layer of governance to the One Planet Cardiff project which brings together key directorate leads, under the steerage of the Chief Executive, to discuss cross cutting issues and resolve more difficult challenges.
105. There has also been very significant progress on engagement with Schools and the youth of Cardiff who are acknowledged to hold the central interest in ensuring that we deliver a sustainable future for the city. A One Planet Schools Pledge is being developed where Schools will be invited to commit to developing their own school specific One Planet Action plan, researched and championed by pupils who will also monitor progress and keep plans on track. This initiative is also being seen as a central strand in implementing the New Curriculum in Wales, which is seeking to build more real-life experience into the teaching and learning processes.

#### **City Wide Behaviour Change Initiatives (Carbon Neutral City action)**

106. It is hoped that the One Planet Schools Pledge will also reach out and start to influence behaviour change at a wider city scale. The overall aim of the project is to encourage well informed and able learners to become ambassadors and champions for the changes that we all need to see. Their knowledge, and influence over friends and family, will be an important educational factor beyond the school environment and should stand them in good stead as they progress to more active roles in society and the economy in future years.
107. Our work with the Climate Emergency Board of public sector, academic and utility partners in the city is also looking closely at behaviour change strategies. Partners have collectively agreed to share best practice and start to align our outreach and internal staff behaviour change strategies so that the wider collective impact of our messages can be reinforced and amplified.
108. Though the above account marks good progress there is still much ground that the Council needs to cover in its Behaviour Change plans and Officers are looking at ways to better resource this. Plans are taking shape to hold a Climate Change convention event in the new year, bringing together the many organisations, groups and stakeholders in the city to discuss our challenges and common interests, and to ensure that this conversation continues and starts to identify and deliver real change.
109. Welsh Government are currently consulting on a new draft Strategy for Public Engagement and Action on Climate Change and the Council will be looking closely at this and aligning procedures wherever possible. In particular, the proposed Climate Change Convention offers an opportunity to draw from best practice and test options arising from this draft

engagement strategy and we plan to engage with the report's authors to explore options.

110. More broadly, officers will be developing some easy to understand, but compelling messages and requests to present to the wider public in the city. The Council is doing all it can to address the climate emergency but citizens, businesses and organisations in the City also need to be fully engaged in this to achieve real success.
111. Work will be needed to develop and promote a rolling list of the easiest and most impactful changes that we all need to try to achieve in our daily lives. We all already know that making sustainable travel choices, buying more responsibly to reduce waste, and taking care over domestic energy efficiency are important. But the Council needs its messages to be well researched, simple and compelling, and supported by good advice and appropriate signposting along the way. In line with current Welsh Government guidance on Climate Change Engagement, we need "*to make the right thing to do the easiest thing to do*", and the Council will be developing a partnership approach to this over the next period.

### **Council Pension Fund – Disinvestment away from High Carbon Activities and Fossil Fuels**

112. Though not directly impacting on operational or city wide emission statistics, the Council is also keen to ensure that its financial investments are ethical and low carbon based wherever possible. In light of this, some recent changes were made to the Cardiff and Vale of Glamorgan Pension fund holdings, including the following three actions:
  - Increasing its proportional allocation of investment to the Low Equity Carbon Tracker fund and introducing a de-carbonisation overlay to a number of its Active Equity Funds
  - The potential for Disinvestment from companies representing a continuing risk who do not respond positively to engagement
  - The soon to be launched WPP Sustainable Equity Fund is expected to see an acceleration in positive investment in companies developing clean technology
113. The Joint Governance Committee of the Wales Pension Partnership has also recently approved the structure of the Sustainable Equity Sub-Fund which will further develop the sustainable credentials of investment, and the target is that this Fund will launch in 2023.

### **Conclusion**

114. Work over the last period has kick-started a very wide range of Council led and collaborative projects to address the Climate Emergency. It has also added significantly to our understanding of the carbon consequences and impacts of our work across many complex areas.

115. The proposed Pathway analysis methodology is now maturing and shows reasonable progress but also highlights the enormous scale of the challenge that the Council faces in the coming years.
116. Despite the good progress it's clear that some things aren't happening fast enough to enable us to fully respond to the Decarbonisation and Climate Emergency agendas at the speed now required. The decarbonisation of the Gas Grid is still a major challenge and progress is much slower than the parallel work on electricity. Work to fully decarbonise buildings therefore remains difficult and costly, and the uncertainties around Government funding support for this in the public sector and in the domestic setting are undoubtedly causing problematic delays on progress. Similarly, the "Metro for the Valleys" scheme is a central opportunity in the City and Region's ability of decarbonise transport and uncertainty around funding decisions is slowing progress here too. Linked to this, global shortages of electronic components resulting from the Pandemic, and the Ukrainian crisis have impacted the price and availability of low emission vehicles and progress here is slower than had been hoped. These challenges are well known and difficult to fix but are inevitably and inextricably linked to our Climate Emergency response.
117. A range of areas has been identified where teams across the organisation can inject new focus and this will trigger a series of more detailed reports and business cases for the Council to consider in the coming months and years.
118. The financial and operational challenges associated to this were always significant but are now in sharper focus as a result of the energy and cost of living crises. This underlines that the Council can't tackle the Climate Emergency alone. Collaboration, communication, goal alignment and good monitoring across the city and beyond is essential and the Council will continue to act as a focal point for this in the next decade and beyond.

### **Scrutiny Consideration**

119. The Environment Scrutiny committee considered this report. Any comments received will be circulated at the Cabinet meeting.

### **Reason for Recommendations**

120. To ensure that the progress and momentum of our Climate Emergency response is recorded and to approve the amended monitoring, modelling and action planning required to continue its delivery.

### **Financial Implications**

121. Meeting targets set out in this report will require additional capital and revenue budgets that have not been assumed in the current budget framework.

122. Whilst the reporting on emissions and updates on progress is an iterative process, priority actions outlined remain un-costed and in many cases are not included in this report.
123. This remains a similar position to that outlined in a July 2022 report of the Auditor General Wales – ‘Public Sector Readiness for Net Zero Carbon by 2030’, which found that public bodies have not fully assessed the financial implications of the 2030 collective ambition.
124. A full understanding of the financial issues, risks and deliverability of the strategy actions needs to take place as proposals are considered.
125. A number of processes, actions and the strategies across various areas referred to in the update continue to be developed or are yet to be developed. These should be prioritised at pace with any financial implications of these considered alongside other Council financial commitments and pressures to ensure the budget framework for 2023/24 and future years includes the full approved commitments for the Council in the medium to long term.
126. The update sets out a number of actions and issues to tackle. However, it is unclear which actions are to be prioritised and over which timescale to make the biggest impact on targets as well as future cost avoidance. It is also unclear as to the financial interventions which have the biggest impact in outcomes achieved per £ of investment i.e. where financial and human resources need to be prioritised to make the biggest impact with least risk.
127. Future actions included in the report developed across Directorates such as energy generation will need to be the subject of robust business cases and consider alternative options to deliver the outcomes having regard to risks and capacity and skills to deliver. Were it approved that the Council should incur such expenditure, without external grant funding, any such projects would significantly increase the Council’s currently assumed borrowing further and to be repaid over a long period of time.
128. The action plan also considers interventions such as buildings retrofit, road resurfacing measures etc. Initial pilot exercises have demonstrated that changes to alternative systems in these areas cost significantly more in current financial terms. Such strategies would again increase the Council’s borrowing requirement significantly if applied to all future planned maintenance. The cost of these pilot exercises are to be met from existing directorate budgets and the One Planet Small Schemes Capital Fund. No further costs are included in the current budget framework.
129. In respect to the Council housing stock, Welsh Government have recently consulted on introducing a new housing quality standard, which focuses on decarbonisation. The costs of meeting any such standard and the decarbonisation of the housing stock is significant and not viable for the rent payer alone to afford, particularly when rents are not controlled by the Council.

130. Without certainty of significant external cash grants for investment in the actions identified in this report, including mobility, there is a significant risk as to whether the actions are affordable or sustainable in the long term. In submitting business cases for the actions identified, these will need to demonstrate how all the all areas of the council can use existing funding in different ways, explore fully and maximise potential additional external grant funding opportunities and consider opportunities for collaboration.
131. Where data is being used to inform decision making and prioritisation, the source of that data needs to be robust, to ensure interventions and scarce resources are allocated to priority areas and requirements for sustainability reporting can be complied with.

### **Legal Implications**

132. The report seeks to review progress with the 2021 One Planet Cardiff Strategy and Action plan, to approve the pathway methodology, and to approve refinements to the plan as set out in the body of this report. The strategy and action plan cover many proposed actions, measures and projects, as such it is not possible in the confines of this legal advice to comment on the legal implications raised by each such action, measure or project. Detailed legal advice will need to be taken on each of the proposed actions, measures and projects as the same are further developed. To the extent that any of the proposed actions, measures or projects require any changes to be made to any of the documents, which comprise the Council's Policy Framework, then such matters will be subject to decision of Council. To the extent that the action plan provides, without caveat, that specified actions will be undertaken, then the adoption of the plan and strategy will serve to create a legitimate expectation that such actions will be undertaken by the Council. The report refers to consultation undertaken. It should be noted that consultation gives rise to the legitimate expectation that the outcome of the consultation will be taken into account when developing and determining to adopt the strategy and action plan.

### **Equalities & Welsh Language**

133. In considering this matter the decision maker must have regard to the Council's duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are: (a) Age, ( b ) Gender reassignment( c ) Sex (d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h)Sexual orientation (i)Religion or belief –including lack of belief.
134. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council

must take into account the statutory guidance issued by the Welsh Ministers (WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 (gov.wales) and must be able to demonstrate how it has discharged its duty.

135. An Equalities Impact Assessment aims to identify the equalities implications of the proposed decision, including inequalities arising from socio-economic disadvantage, and due regard should be given to the outcomes of the Equalities Impact Assessment attached to this report.
136. The decision maker should be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

### **The Well-being of Future Generations (Wales) Act 2015**

137. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The wellbeing objectives are set out in Cardiff's Corporate Plan 2020 -23.
138. When exercising its functions, the Council is required to take all reasonable steps to meet its wellbeing objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the wellbeing objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
139. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
  - Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
140. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible on line using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

## Policy and Budget Framework

141. The decision maker must be satisfied that the proposal is within the Policy and Budget Framework, if it is not then the matter must be referred to Council.

## HR Implications

142. There are a number of elements within the action plan that will be further developed and will have HR implications. As these items develop there will be full consultation with Trade Unions and staff appropriate to the specific item. If there is a requirement to change any Council policies that effect staff then the corporately agreed process will be followed.

## Property Implications

143. The Built Environment comprises a significant proportion of the Council's carbon footprint. The Corporate Property Strategy 2021-26 sets out the Council's approach to achieving the target of a net zero built environment by 2030. This will be supported with additional detail on the various projects and initiatives in forthcoming Annual Property Plans.
144. It remains essential to develop appropriate internal governance and allocate adequate resource to manage the carbon reduction initiatives for all streams of One Planet Cardiff. The pathway modelling methodology is an important means of establishing consistency of reporting supported by verifiable data. It will be important to ensure alignment with the methodologies and data used for Built Environment carbon modelling, and to ensure timely notification of reporting to facilitate required data validation.

## RECOMMENDATIONS

Cabinet is recommended to:

- 1) Note the progress made on carbon reduction in the first year of One Planet Cardiff Action
- 2) approve the Pathway modelling methodology as a tool for onward monitoring and decision making
- 3) note and approve the refinement and progress of the One Planet Cardiff Action Plan
- 4) note and approve the intention to hold a Climate Change Convention in 2023

<b>SENIOR RESPONSIBLE OFFICER</b>	Andrew Gregory Director of Planning, Transport & Environment
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*The following appendix is attached:*

Appendix 1 - One Planet Cardiff – Action Plan Review 2022

*The following background papers have been taken into account*

*One Planet Cardiff Strategy*



# One Planet Cardiff – Council Action Plan

## Review of Progress 2022



# Action Plan Review - **BUILDINGS**

Council Impact	City Impact
<p data-bbox="78 582 122 768" style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 154</p> <p data-bbox="78 372 682 422"><b>Estates Energy Efficiency</b></p> <ul data-bbox="78 429 703 522" style="list-style-type: none"><li>• 18% reduction since 2019/20</li><li>• 55% reduction since 2014</li></ul> <p data-bbox="78 582 1026 625">Net-Zero New build and Retrofit pilots in progress</p> <p data-bbox="78 682 1059 725">Performance sensors/baselining measures in place</p> <p data-bbox="78 782 1245 875">Detailed and costed Council Buildings programme and action plan being prepared for Cabinet Consideration</p>	<p data-bbox="1314 315 2033 365"><b>Housing – 28% of City footprint</b></p> <p data-bbox="1314 372 2308 465">Major Council flats retrofit programme progressing. Grant schemes in development with WG and Region</p> <p data-bbox="1314 522 2448 715">Increased Fuel Poverty and cost of living crisis challenges. Outreach beyond those in fuel poverty needed for major city impact – discussing possibilities with Cardiff Capital Region and others and Govt role acknowledged</p> <p data-bbox="1314 782 1905 832"><b>Commercial Development</b></p> <p data-bbox="1314 839 2384 932">Strong Planning Policy Position Statement in Place Climate Change and Carbon at the heart of the new LDP</p>

# Action Plan Review – MOBILITY

## Council Impact

**Collective emissions = 30% Council Operational total:**

### **Fleet:**

Significant EV's now operational incl 10 Waste Vehicles  
Charging infrastructure also in place at key sites  
Revised Fleet Strategy in preparation aiming for full transition to low emission vehicles

### **Grey Fleet:**

Cross Authority review underway – requires operational needs audit and HR policy examination

### **Commute:**

Staff Incentives scheme developed  
Links with Hybrid working plans and on-line meetings  
Large numbers of staff still location based (esp schools)

## City Impact

**Almost 40% of City Wide Emissions**

### **Transport White Paper:**

Electric Bus Fleet Operational  
Almost 70 public EV chargers in place by Spring 2023  
Cycle priority and traffic calming strategy well advanced but with more to do over the next decade  
Rail electrification advancing

Requires significant behaviour change from all alongside hard measures

# Action Plan Review – SUPPLY CHAIN & PROCUREMENT

## Council Impact

**Dwarfs other emissions >80% of total**

### **New Procurement Strategy in place:**

Carbon and circular economy as central themes  
Signals to supply chains that Carbon will soon be a competitive factor in tender

### **Pilot Projects – designing out high carbon elements:**

- Low/zero carbon road resurfacing
- Net zero new build school pilot project
- LED replacement – buildings and street lighting

### **Next Steps:**

Issue Directorate spend/carbon profiles and develop deeper understanding of high carbon impact spend areas.

Commence carbon literacy and training support for Specifiers.

Work with WG to improve impact assessment methodology

## City Impact

### **Socially Sustainable Procurement Strategy**

Supports and stimulates wider change amongst suppliers

### **PSB partnership approach**

Co-ordinated ambitions and messaging to the market being considered with our public sector partners in the city

# Action Plan Review – Recycling and Waste

Council Impact	City Impact
<p><b>Minimal inclusion in WG carbon framework</b> Disguises impressive track record</p> <p><b>Action Plan for Further Improvements:</b></p> <ul style="list-style-type: none"><li>• Increase Recycling Participation and Capture</li><li>• Increase opportunities to recycle</li><li>• Improve the material quality of recycling sent for re-processing an</li><li>• Encourage and support the reuse and repair of materials.</li></ul>	<p><b>Wales amongst the leaders in the world</b></p> <p>Awareness raising and behaviour change support is a constant need</p>

# Action Plan Review – Renewable Energy

Council Impact	City Impact
<p><b>Significant rooftop solar in place</b></p> <p>Another tranche in development</p> <p><b>Plans for 2 new major renewables schemes being developed.</b></p> <p>One could supply direct energy to operations and vehicles at Lamby Way (potentially significant impact)</p>	<p><b>Lamby Way Solar Farm complete</b> Decarb benefits to Grid and Waste Water Treatment Works</p> <p><b>Cardiff Heat Network</b> Under construction – reducing the need for gas/electricity for heating in the Bay</p> <p><b>Tidal Power</b> Western gateway and CCR re-examining the case</p>

# Action Plan Review – Green Infrastructure & Adaptation

Council Impact	City Impact
<p><b>Coed Caerdydd</b> Increasing the City's tree canopy by 25%</p> <p>Direct impact where planting is on Council land</p> <p>Challenges in finding space, long term management resource and recording impacts appropriately (after planting matures)</p>	<p><b>Coed Caerdydd</b> Increasing the City's tree canopy by 25%</p> <p>Positive partnership working and outreach with planting on non-council land in progress – more opportunities needed and being explored</p> <p><b>Flood Defence Schemes</b> Sustainable Urban Drainage Schemes (SUDS) now starting to emerge as standard Bespoke schemes delivered (Greener Grangetown, Central Square, Cathays Terrace, etc) Updated Flood Defence Strategy in development</p>

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# Action Plan Review – Food

Council Impact	City Impact
<p><b>Food Strategy:</b> Focus on Schools Food Edible Playgrounds Study to optimise health and carbon benefits in menu planning 40 School kitchen improvements by Christmas 22</p>	<p><b>City Growing Plans</b> Pilot community growing opportunities on Council land £2.5m CCR funded innovation project for “local healthy food” Local Development Plan Policy review to identify “food deserts” and relevant policy response</p>

# Action Plan Review – Behaviour Change & Engagement

## Council Impact

### Embedding Carbon in Council Decision Making

CEx level meetings to address cross cutting, complex issues

### Staff engagement

Carbon Literacy Training

Travel incentives

Specifier Training

### Schools and Youth Engagement

One Planet Schools Pledge

Strengthening of network of advisors and support

Cardiff Youth Council as Champions

Curriculum integration of Climate Change Agenda

## City Impact

### PSB Climate Emergency Board

Alignment of public, academic and utility partner strategies

Focus on collaboration around

- Fleet and Mobility
- Procurement
- Estates and Green Infrastructure
- Behaviour Change

### Climate Change Convention

Plans developing for major stakeholder event

### Behaviour Change Campaign

Focus areas:

1. Transport
2. Energy and heating
3. Waste & Recycling
4. Food

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**LOCAL AIR QUALITY MANAGEMENT – CARDIFF COUNCIL**  
**AIR QUALITY ANNUAL PROGRESS REPORT 2022**

**CLIMATE CHANGE (COUNCILLOR CARO WILD)**  
**TRANSPORT & STRATEGIC PLANNING (COUNCILLOR DAN DE'ATH)**

**AGENDA ITEM: 4**

**Reason for this Report**

1. The purpose of this report is to seek approval for the 2022 Cardiff Council Local Air Quality Management (LAQM) Annual Progress Report (APR), based upon on air quality datasets obtained in 2021, for submission to Welsh Government for approval.
2. To note the receipt of further legal direction from Welsh Government regarding the Clean Air Plan, including the requirement to assess and decide upon a permanent transportation scheme for Castle Street to an agreed programme.

**Background**

3. Poor air quality is now considered the largest environmental risk to public health in the UK.<sup>1</sup> There is clear scientific evidence that shows that air pollution exposure reduces life expectancy by increasing mortality and morbidity risk from heart disease, and strokes, respiratory diseases, lung cancer and other conditions.
4. In the UK, in the context of air quality management, the main air pollutants that are the primary public health concern are particulate matter and Nitrogen Dioxide (NO<sub>2</sub>). In the UK, it has been estimated that an equivalent of 23,500 deaths can be attributed to long-term exposure to NO<sub>2</sub> each year.<sup>2</sup>
5. The principal source of these pollutants is from road transport emissions, particularly from diesel cars. In 2012, the International Agency for Research on Cancer listed diesel exhaust pollution as a

<sup>1</sup> Estimating local mortality burdens associated with particulate air pollution', Public Health England, (2014)

<sup>2</sup> Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities: UK overview document' Defra (2015)

Class 1 carcinogen<sup>3</sup> and extended this to all ambient air pollution in 2013<sup>4</sup>.

6. Public Health Wales has stated that poor air quality is the second greatest public health concern after smoking and is the most significant environmental determinant of health. In Wales, based on data for the period 2011-2012, it has been estimated that an equivalent of 1,100 avoidable deaths can be linked to NO<sub>2</sub> exposure each year.
7. Poor air quality does not only cause ill health, but it also has a wider societal cost. Accounting for health service costs and reduced productivity through lost workdays in the UK this is significant, standing at around £20bn every year<sup>5</sup>.
8. Some people are more at risk than others. Air pollution can disproportionately affect vulnerable population groups (e.g., children, older people, people with underlying chronic disease), as well as those exposed to higher levels because of living or commuting in urban or deprived locations<sup>6</sup>.
9. Examining the most recent datasets (2017) made available by Public Health Wales for the total number of all-cause non-accidental deaths registered in the Cardiff and Vale University Health Board area, the long-term mortality burden attributable to air pollution (fine particulate matter and nitrogen dioxide combined) is an estimated effect equivalent to 178-227 deaths.
10. Under Section 82 of the Environment Act 1995 every local authority has an obligation to regularly review and assess air quality in their areas, and to determine whether or not air quality objectives to protect health are likely to be achieved. Where the air quality reviews indicate that the air quality objectives are not being achieved, or are not likely to be achieved, Section 83 of the 1995 Act requires local authorities to designate an Air Quality Management Area ('AQMA'). Section 84 of the Act ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves.
11. The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138) and Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298).
12. This Annual Progress Report provides details on the ratified data for air quality monitoring undertaken in 2021 within the Cardiff Council area.

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<sup>3</sup> International Agency for Research on Cancer, (October 2013)

<sup>4</sup> Every breath we take: the lifelong impact of air pollution', Royal College of Physicians and Royal College of Paediatrics and Child Health (2016).

<sup>5</sup> National Institute for Health and Care Excellence 2017

<sup>6</sup> WHO Regional Office for Europe 2016

13. Welsh Government issue statutory policy guidance to Local Authorities under section 88 of the Environment Act 1995 to bring the local air quality management system in Wales into line with the sustainable development principle outlined in Welsh Government's Well-being for Future Generations legislation, 2015. This guidance, with which local authorities must have regard to when carrying out their air quality functions under the Environment Act 1995, sets out that authorities in Wales have to publish an Annual Progress Report (APRI) by 31<sup>st</sup> December at the latest. This report must include monitoring results for the previous calendar year, a progress report on action plan implementation and an update on any new policies or developments likely to affect local air quality.
14. The APR attached in Appendix 1 satisfies the above criteria examining ratified datasets for air quality monitoring undertaken in 2021 within the Cardiff Council area.

#### Background: Welsh Government Clean Air Direction

15. In 2020 Cardiff Council received a direction from Welsh Government. In response the Council's published [Full Business Case](#) (Final Plan) set out a series of measures not only aimed at ensuring compliance on the A4161 Castle Street could be achieved in the shortest possible time, but provided city wide air quality improvements. The measures set out and approved by Welsh Government included:
  - Implementation of Electric Buses – 36 Electric Buses;
  - Bus Retro Fitting Programme;
  - Taxi Mitigation Scheme; and
  - City Centre Transportation Improvements.
16. A key component of the Clean Air Plan to deliver compliance was the full implementation of the City Centre Schemes, particularly the City Centre North (Castle Street) Scheme. The schemes would establish a high-quality active travel infrastructure for the city and improve connectivity between key developments by strategically aligning bus routes and enhancing links with the new Transport Interchange. These schemes were due to commence in early 2020, prior to the onset of the COVID pandemic.
17. In June 2021 Cabinet approved the construction of the original City Centre North Scheme as detailed in the Clean Air Plan, albeit on an interim basis. This basis of implementing an interim scheme was on the need that any wider impacts following a full post Covid recovery period could be fully accounted for to ensure that no detrimental impacts in terms of congestion and air quality would result from the Clean Air Scheme.
18. Following implementation of the interim scheme the Council has maintained regular monitoring and assessment of traffic and air quality impacts on Castle Street to demonstrate that compliance is being

maintained. The results from 2021, as detailed in the previous section of this report showed that the annual result for NO<sub>2</sub> on Castle Street was 26 µg/m<sup>3</sup>. Results for 2022 up to the end of October showed a result of 32 µg/m<sup>3</sup>, which is not unexpected given the reintroduction of traffic and reflects the modelling work undertaken on the Clean Air plan.

19. Owing to the decision for an interim scheme being implemented in late 2021, the Council has ensured that constant dialogue and ongoing collaboration with Welsh Government officials has been maintained to ensure that the Plan remains on course to deliver and maintain compliance.

## Issues

### Covid-Pandemic

20. During the COVID-19 pandemic local air quality monitoring continued in Cardiff. In 2021 the Council ensured that air quality data collection was maintained and following the lifting of restrictions in 2021 monitoring resumed as normal.
21. The results for 2021, have been corrected/ ratified to account for the gaps in the annual datasets incurred by the COVID situation.

### Air Quality in Cardiff

22. There are currently four Air Quality Management Areas (AQMA) declared across Cardiff which have all been declared due to exceedances of the annual mean NO<sub>2</sub> Air Quality Standard (40 µg/m<sup>3</sup>), the main source of the pollution being derived from road transport emissions. The established AQMA are:
  - **Cardiff City Centre AQMA** (declared 1/4/13 to incorporate Westgate Street; formerly St Marys St AQMA);
  - **Ely Bridge AQMA** (declared 1/2/07);
  - **Stephenson Court AQMA** (declared 1/ 12/10); and
  - **Llandaff AQMA** (declared 1/4/13).
23. **The 2022 Annual Progress Report presents monitoring data captured in 2021.** In line with the Cardiff Council's (CC) statutory duties under Part IV of the Environment Act 1995, Shared Regulatory Services on behalf of CC undertakes regular air quality monitoring at specifically allocated locations across Cardiff using automated and non-automated principles for ambient air Nitrogen Dioxide (NO<sub>2</sub>), Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>), Sulphur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO) & Ozone (O<sub>3</sub>).

### Automated Monitoring Network

24. In 2021, Cardiff had four automatic air quality monitoring sites located at Frederick Street in the City Centre, Richard's Terrace, just off Newport Road, Castle Street and Lakeside Primary School.

25. The Frederick Street (Urban Background) site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub> feeding data directly into Defra's Automatic Urban and Rural Network (AURN).
26. The Richard's Terrace site (Urban Traffic/ Roadside monitors on a 24/7 basis measuring levels of NO<sub>2</sub> & PM<sub>10</sub> at that location, feeding data directly into Defra's Automatic Urban and Rural Network (AURN).
27. The Castle Street site was installed as part of the Council's Clean Air Plan and the site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location, forming part of the Welsh Air Quality Network.
28. The 2021 results of the monitoring for NO<sub>2</sub>, and PM<sub>10</sub>, at the above-mentioned stations is presented in Table 1.

**Table 1 - Summary of Automated Results for NO<sub>2</sub> , PM<sub>10</sub> and PM<sub>2.5</sub> as annual averages**

Site Name	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> )
Frederick Street City Centre	16	13	9
Richards Terrace Newport Rd	22	17	N/A
Castle Street	25	12	9

29. The results obtained at all 3 sites demonstrate compliance with the national air quality objectives for both NO<sub>2</sub> and PM<sub>10</sub> which are set at 40 µg/m<sup>3</sup> as an annual average. Full datasets for these monitors are available on the Welsh Air Quality Forum Website <https://airquality.gov.wales/> .
30. Lakeside Primary School (Urban Background) site monitors on a 24/7 basis measuring levels of Polycyclic aromatic hydrocarbons (PAH) at that location, feeding data directly into Defra's PAH Digital (solid phase) Network. SRS serve as a local site operator to this site, however data interpretation is sanctioned by the consultants Ricardo Energy and Environment Ltd. Therefore, the purpose of this site and results derived are not corresponded to any of the limit values outlined for the purposes of LAQM in Wales.
31. In addition, Cardiff Council has acquired 7 near real time indicative air quality analysers. 5 analysers were purchased with the financial support of Welsh Government and the 2 analysers were facilitated by the Shared Regulatory Services (SRS) who had successfully accrued funding via a S106 planning contribution. The analysers have been specifically placed

in locations to monitor the impacts of the Clean Air Plan, and also improve monitoring in the Llandaff AQMA and represent relevant exposure. The remaining monitor has been installed in Canton owing to traffic and pollution concerns raised with SRS by local members and residents alike. The analysers continuously monitor for Nitric Oxide, Nitrogen Dioxide & Ozone, PM10 & PM2.5, and do so every 15 minutes (data uploaded every hour).

32. Results captured from the AQMesh monitors are summarised in Table 2 below

**Table 2 - AQ MESH Data Summary 2021**

Site Name	Valid Data Capture 2021 %	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> )
Westgate Street*	0	N/A	N/A	N/A
Lower Cathedral Road	100	19.9	11.1	8.5
Tudor Street	100	20	13.9	10.7
North Road	100	22.1	9.5	7.8
Penarth Road	100	12.7	11.5	9.5
Lansdowne Road, Canton**	54	25.6	16.6	11.4
Llandaff AQMA	11	12	9.3	20.72

\*Westgate Street Monitor suffered numerous technical issues which has meant data capture for 2021 was not valid. Instrument has been fully recommissioned in 2022

\*\* -data capture representative of period monitored was installed.

### Non-automatic Monitoring Sites

33. In 2021 CC operated 108 specifically allocated non automatic monitoring sites in Cardiff which monitor levels of Nitrogen Dioxide (NO<sub>2</sub>).
34. **In 2021, out of the 108 monitoring locations across the entire City, no monitoring sites recorded exceedances of the annual average objective set for NO<sub>2</sub> (40 µg/m<sup>3</sup>).**
35. The results are indicative that the levels of air pollution were still being influenced from the ongoing impacts of the COVID lockdown restrictions that were in place in the first part of 2021 and have had an impact on pollution levels in Cardiff which is likely owing to traffic volumes having remained below pre-COVID levels.
36. However, it is evident that concentrations have increased compared to the results in 2020 and this is likely reflective of the easing of restrictions throughout 2021 and increased travel patterns detailed in Figure 1 below. It is therefore likely that the concentrations recorded in 2021 were still not fully representative of a business as usual scenario and the results have generated a small bias/ underestimation of levels of pollution across Cardiff in 2021.

**Figure 1 - Overall Traffic Levels in Cardiff Relative to 2019 (Pre-COVID)**



- 37. It is anticipated that results from 2022 are likely to be more representative of ‘settled’ conditions owing to the easing of most Covid restrictions.
- 38. In accordance with Welsh Government’s (WG) Local Air Quality Management Policy Guidance, July 2017, Cardiff Council recognise that there is no defined “safe level” when describing levels of air quality and work remains ongoing to reduce air pollution across Cardiff.

**Results in AQMAs**

**City Centre AQMA**

- 39. It is apparent that annual average NO<sub>2</sub> datasets in the City Centre, in and around the AQMA, were still being impacted by the pandemic as each monitoring location demonstrated compliance with the NO<sub>2</sub> objective of 40 µg/m<sup>3</sup> as an annual average. However it is evident that compared to 2020, there have been some slight increases in NO<sub>2</sub> concentrations in the City Centre AQMA. However the results are still significantly below pre pandemic levels, which may be influenced by the fact Castle Street remained closed to general traffic until the end of October 2021.
- 40. Using sites 186 & 187 located on Castle Street, levels measured in 2019 pre pandemic were 44 µg/m<sup>3</sup> at both sites. In comparison for 2020 the same locations recorded concentrations of 23 µg/m<sup>3</sup> and 26 µg/m<sup>3</sup>, and in 2021 both sites recorded concentrations of 26 µg/m<sup>3</sup>.

**Ely Bridge AQMA**

41. Monitoring undertaken within the Ely Bridge AQMA, at the façade of residential properties (Site 117, 192 & 218) recorded annual average levels of NO<sub>2</sub> below 40 µg/m<sup>3</sup>. Although levels captured are compliant with the air quality objectives, they need to be considered in light of the Covid pandemic and thus it is considered necessary that the AQMA should remain in place and focussed monitoring has continued into 2022.
42. Results from 2021 shows slightly increased NO<sub>2</sub> concentrations compared to 2020, but still maintain a reduction compared to 2019 pre-Covid.

### **Llandaff AQMA**

43. Residential monitoring locations within the Llandaff AQMA, all indicate compliance with the annual average objective for NO<sub>2</sub> in 2021.
44. Site 212 which did indicate an exceedance of the annual average objective in 2019 with an annual average reading of 41.3 µg/m<sup>3</sup> recorded a concentration of 33 µg/m<sup>3</sup> in 2020. This has increased to 37 µg/m<sup>3</sup> in 2021 which is likely reflective of the easing of Covid restrictions and increase in journeys and traffic volumes compared to 2020.
45. As a result focussed monitoring in the Llandaff AQMA has continued in 2022, including use of real time data and any future actions to improve air quality in the AQMA will be considered as part of the review of the citywide Clean Air Strategy & Action Plan (CASAP) as detailed below in paragraph 55. Monitoring will also be further enhanced with a further increase in realtime monitors being installed in the AQMA.

### **Stephenson Court AQMA**

46. All three monitoring sites within the Stephenson Court AQMA (Sites, 81, 131 & 198) show compliance with the annual average objective, and no site recorded concentrations >30 µg/m<sup>3</sup>.

### **Summary of Results in the AQMAs**

47. Table 3 summarises the highest recorded annual average result at a residential location within each of the 4 AQMAs in 2021, thus representing worse case relevant exposure in terms of the annual objective for NO<sub>2</sub>. It should be noted that the results summarised below in some instances is not a portrayal of the same monitoring site year on year, owing to variations in concentrations and the addition of any new monitoring sites.

**Table 3 - Highest Annual Average NO<sub>2</sub> Concentration (µg/m<sup>3</sup>) in AQMAs**

AQMA	Annual Average NO <sub>2</sub> Concentration (µg/m <sup>3</sup> ) Air Quality Standard =40 µg/m <sup>3</sup>							
	2014	2015	2016	2017	2018	2019	2020	2021
City Centre	42.1	38.2	38.7	38.2	37.3	35.6	24.7	26.4
Stephenson Court	41.2	39.5	29.6	36.7	38.2	35.7	28.4	29.3



Ely Bridge	42.3	39.5	41.3	38	39.9	38.6	30.4	31.7
Llandaff	37.2	32.3	35.0	32.5	32.5	41.3	32.9	37.4

48. Whilst concentrations show compliance with the AQS for NO<sub>2</sub> the Council needs to be mindful of the ongoing influence of the continued COVID impacts which may have impacted these results particularly in the City Centre and Stephenson Court AQMAs. It is apparent that concentrations around Ely Bridge and particularly Llandaff AQMAs have increased in 2021.
49. Monitoring within the AQMAs has therefore continued in 2022, and consideration of any future actions for the AQMAs which could include reviewing the boundary or revoking the AQMA will be assessed by the Council once an assessment of the longer-term recovery from Covid has been determined.
50. The results to date for 2022 are currently suggesting a stabilisation of results owing to the removal of all Covid restrictions. It is therefore imperative that focussed monitoring within the AQMAs continues and the need for any further action reviewed accordingly once it is confident that a near normal/ new normal situation has stabilised following the pandemic.
51. Although the 2021 data indicates that compliance is met in all four AQMAs, the Welsh Government has stated that *'air just barely compliant with the objectives is not 'clean' and **still carries long-term health risks** and while compliance with the national air quality objectives is essential, it is desirable to keep levels of pollution as low as reasonably practicable.'*<sup>7</sup>
52. In accordance with LAQM best practise guidance, there are no monitoring sites in the district with annual average concentrations above 60 µg/m<sup>3</sup> in 2021. This is therefore indicative that is unlikely that the hourly NO<sub>2</sub> objective was exceeded during this monitoring period.
53. Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. Therefore Cardiff Council has a statutory requirement to produce an Air Quality Action Plan (AQAP) for each identified AQMA.
54. In 2017 the Council gave a commitment to produce a Clean Air Strategy and Action Plan by 2018. This objective of this report was to develop an Action Plan to address air quality issues not only in the AQMAs, but across all of Cardiff.
55. Highlighting this commitment, in 2018, SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy coincided with Cardiff's Capital Ambition report and helps to implement and deliver the priorities with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS &

<sup>7</sup> [Welsh Government Local air quality management in Wales Policy guidance June 2017](#)

Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff.

56. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).
57. It will be imperative that the CASAP is reviewed following the full implementation of the Clean Air Plan in order to further prioritise measures, to ensure air quality levels are continuously improved in Cardiff. Therefore, it is likely that the CASAP will need a full review and update in 2023/24.

### **School Monitoring - School Streets Project**

58. In view of the corporate commitment to deliver active travel plans for all schools, SRS was commissioned by Cardiff Council's Transportation, Policy and Strategy Team to assist with Cardiff Council's Schools Streets pilot project in October 2019, which involves the temporary closure of road links surrounding and initial 6 specific schools in Cardiff.

- Whitchurch High Lower;
- Ysgol Melin Gruffydd;
- Peter Lea Primary;
- Llandaff Church in Wales
- Primary; Pencaerau; and
- Lansdowne Primary

59. These initial schools were selected for the pilot project owing to an assessment made by the Road Safety Team following numerous concerns and correspondence received relating to road safety issues at these schools. The road layouts at these schools allowed for the project to be accommodated.

60. The Traffic Regulation Order (TRO) is effective during the schools' morning and afternoon drop-off and pick-up hours. This project is seen as an excellent opportunity to take action to encourage parents, staff and children to adopt an alternative mode of travel.

61. Shared Regulatory Services (SRS) have further supported this pilot project by providing additional air quality monitoring at an additional 9 schools. The monitoring at the additional schools commenced in December 2020 and the initial years data has been presented in the 2022 APR. The additional 9 schools are:

- St Cuthbert's School;
- Tredegarville School;

- St Peters School;
  - St Monica's / Gladstone School;
  - Lakeside School;
  - Bryn Hafod School;
  - Glan Yr Afon School;
  - Willow Brook School; and
  - Creigiau School
62. SRS gather monthly datasets for NO<sub>2</sub> using non- automated passive diffusion tubes, undertaken at the schools' premises, inside the TRO zone at a residential façade and outside the TRO zone at a residential façade. This strategic placement of monitoring sites allows the examination of potential displacement impacts as a result of the adopted TRO zone.
63. The results obtained from each of the school sites indicated **full compliance with the NO<sub>2</sub> annual average objective of 40 µg/m<sup>3</sup> at all sites.**
64. Full details of the results are presented in the Annual Progress Report.

#### **Clean Air Plan: Response to the Welsh Government Direction**

65. Following on from the development of the temporary approach to mitigating poor air quality impacts on Castle St, Welsh Government, working in full partnership with Cardiff Council, have issued the Council with a further legal direction under Part IV of the Environment Act 1995.<sup>8</sup> This direction sets out measures the Council needs to implement to ensure that compliance for the NO<sub>2</sub> limit value on Castle Street is maintained. A copy of the direction is contained in Appendix 2. Further detailed assessment work is currently being progressed in line with requirements of the Direction.
66. At the time of writing this report detailed assessment works on a number of potential options for Castle Street is being progressed in line with the requirements of the 2022 Direction and officers have continued on going dialogue with Welsh Government to ensure they are kept abreast of the assessment works. A Final Plan to comply with the Direction will set out a full business case/ funding requirements for the final scheme which will require final approval from Welsh Government early in 2023.

#### **Electric Buses**

67. Cardiff Bus procured 36 EV buses Cardiff Council has been successful in supporting the transition of buses on the Cardiff network to becoming fully electric. Cardiff Bus were enabled to introduce 36 new electric buses into their fleet from January 2022. It was delivered through a collaboration between Cardiff Bus and Cardiff Council after a successful bid for funding from the Department for Transport's (DfT)

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<sup>8</sup> <https://gov.wales/environment-act-1995-activity-ensure-nitrogen-dioxide-compliance-air-quality-direction-2022-cardiff>

Ultra-Low Emissions Bus (ULEB) Scheme that received funding of £5.7m.

### **Bus Retrofit Scheme**

68. As detailed in the 2021 report the Council awarded funding to two bus operators who applied to the bus retrofit scheme. As per the requirements of the grant 80% funding to cover capital costs has been awarded to Cardiff City Transport Services Ltd (Cardiff Bus) to retrofit 20 buses, and Stagecoach South Wales to retrofit 29 vehicles.
69. Both operators completed the programme of works in Q4 of 2021, and has ensured that their older buses have improved their NOx emissions by some 90%.

### **EV Taxi Scheme and Taxi Fleet**

70. In Q3 of 2021 the Council procured 5 fully electric wheel chair accessible Dynamo Hackney Carriage Taxis. In partnership with a local vehicle hire company the Council launched an EV Taxi Lease Scheme with for licensed Cardiff drivers to take up an EV Taxi at the start of 2022. At the time of writing this report the Council is working further with our hire partner to further incentivise the scheme to improve take up of the scheme.
71. Previous engagement has taken place with the Taxi Trade on measures to further improve future emissions from the Taxi fleet in Cardiff. The Council needs to establish a policy pathway for the taxi fleet to be ULEV by 2028/30 in line with the Councils overall One Planet Cardiff. Over the coming months the Council will review available options to accelerate the transition of the taxi fleet to cleaner vehicles, including options for any financial grants to achieve this ambition.

### **Establishing a real-time city-wide air quality monitoring network**

72. As detailed in last year's report approval was sought to undertake a pilot programme of expanding the Councils real time monitoring capability. At the time of writing this report the locations of where the monitors will be located are being finalised and the installation of the monitors will be completed in early 2023. The location of the monitors has been undertaken on a risk based approach in line with government Technical Guidance and where sensitive receptors are likely to be exposed to potential air pollutants, including residential properties and primary schools.

### **Scrutiny Consideration**

73. The Environment Scrutiny Committee considered this item. Any comments received will be report to the Cabinet meeting

## **Reason for Recommendations**

74. To enable Cardiff Council to agree a final version of the Annual Progress Report on Local Air Quality Management to Welsh Government to meet statutory reporting requirements.

## **Financial Implications**

75. The Shared Regulatory Service has an existing budget to complete a programme of air quality management and monitoring across Cardiff. This report sets out the annual progress report for approval and submission to Welsh Government in line with statutory reporting requirements.
76. Welsh Government issued an additional Air Quality Legal Direction in September 2022. Work is ongoing in this regard with additional assessment works planned to be completed to inform the business case for the final scheme at Castle Street which will be subject to Welsh Government approval.
77. Future reports will need to update on the ongoing work regarding the full review of the Clean Air Strategy and Action plan which is planned to take place in 2023/24. In addition, updates will be required on the delayed pilot programme for an expansion of the Air Quality Monitoring Network which is currently planned to be implemented in early 2023. Any updates should clearly set out any additional outcomes and financial implications. In addition, consideration will need to be given as to how any ongoing revenue costs from any planned expansion of a successful pilot could be funded.

## **Legal Implications**

78. The recommendations in this report are to mainly to note the air quality monitoring results, the update to the Air Quality Legal Direct legal direction, and to approve the submission of the Annual Progress Report attached to this report. As part of the Council's ongoing reporting requirements.
79. The legislative framework is set out in the body of this report. The decision make nee sot be satisfied that it has all the relevant information available before making any decision and have regard to the further general advice set out in these implications.

## **General Advice**

80. Any decision must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial

regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all circumstances and comply with all equalities legislation.

## Equality Act 2010

81. In considering this matter the decision maker must have regard to the Council's duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are: (a) Age, (b) Gender reassignment (c) Sex (d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h) Sexual orientation (i) Religion or belief – including lack of belief.
82. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers ([WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 \(gov.wales\)](#)) and must be able to demonstrate how it has discharged its duty.
83. The decision maker should be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

## The Well-being of Future Generations (Wales) Act 2015

84. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The wellbeing objectives are set out in Cardiff's Corporate Plan 2020 -23.
85. When exercising its functions, the Council is required to take all reasonable steps to meet its wellbeing objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the wellbeing objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
86. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met

without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

87. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible on line using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### **HR Implications**

88. There are no HR implications arising from this report

### **Property Implications**

89. There are no property implications arising from this report

### **RECOMMENDATIONS**

Cabinet is recommended to:

1. Note and accept the monitored results gathered in 2021 and approve the 2022 Annual Progress Report (as attached as Appendix 1) for submission to Welsh Government for approval by the 31<sup>st</sup> of December 2022.
2. Note the receipt of the updated Air Quality Legal Direction issued on the 21<sup>st</sup> September 2022 and that work to comply with the Direction is being progressed.

<b>SENIOR RESPONSIBLE OFFICER</b>	Andrew Gregory Director of Planning, Transport & Environment
	9 December 2022

*The following appendices are attached:*

Appendix 1: Cardiff Council Annual Air Quality Progress Report 2022.





# Appendix 1



## Cardiff Council 2022 Air Quality Progress Report

In fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

Date: 28<sup>th</sup> October 2022

<b>Information</b>	<b>Cardiff Council</b>
<b>Local Authority Officer</b>	Jason Bale
<b>Department</b>	Shared Regulatory Services
<b>Address</b>	Cardiff Council, County Hall, Cardiff,. CF10 4UW
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<b>Report Reference Number</b>	SRS/CC/APR2022
<b>Date</b>	28/10/2022

## Executive Summary: Air Quality in Our Area

What has become distinctly apparent is that air Pollution is a local and national problem. Long-term exposure reduces life expectancy by increasing mortality, as well as increasing morbidity risks from heart disease and strokes, respiratory diseases, lung cancer and other effects.

What we know is that poor air quality in Wales poses as a significant concern for Public Health, regarded as the most significant environmental determinant of health. Its associated adverse risk to public health is particularly prevalent within urban areas and near major roads. The pollutants of primary concern for public health are particulate matter and primary/ secondary derived nitrogen dioxide (NO<sub>2</sub>). Both pollutants primarily originate from motor vehicles.

The UK expert Committee on the Medical Effects of Air Pollution (COMEAP) estimates that air pollution is responsible for “an effect equivalent of between 28,000 and 36,000 deaths (at typical ages) each year”<sup>1</sup>. This does not mean there are ‘actual’ deaths from air pollution exposure; rather, that the reduced life expectancy which everyone experiences because of air pollution exposure (6-8 months on average, but could range from days to years) is ‘equivalent’ to between 28,000 and 36,000 deaths when summed. In Wales, based on the latest data available (for 2017)<sup>2</sup>, Public Health Wales estimates the burden of long-term air pollution exposure to be the equivalent of 1,000 to 1,400 deaths (at typical ages) each year.

Examining the most recent datasets (2017) made available by Public Health Wales for the total number of all-cause non-accidental deaths registered in the Cardiff and Vale University Health Board area, the long term mortality burden attributable

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<sup>1</sup> COMEAP (2018). Associations of long-term average concentrations of nitrogen dioxide with mortality. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/734799/COMEAP\\_NO2\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf)

<sup>2</sup> Welsh Government StatsWales. <https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Air-Quality/airqualityindicators>

to air pollution (fine particulate matter and nitrogen dioxide combined) is an estimated effect equivalent to 178- 227 deaths.

Despite the efforts made by national government and local authorities there is an apparent disconnection between air quality management and Public Health. The status of Air quality management in Wales focuses upon a hotspot approach and fails to reference other factors such as socioeconomic status or exposure to other environmental determinants of health.

Fundamentally, it is plausible that air pollution affects everyone to some extent. Whilst the legislative air quality limit values are based on epidemiological evidence and are ultimately intended to protect public health, there is also recognition that health effects may be experienced below these thresholds for some of the key pollutants (e.g. PM<sub>2.5</sub> and NO<sub>2</sub>), particularly affecting most susceptible groups: young children, the elderly and those with pre-existing health conditions and comorbidities. Acknowledged as the triple jeopardy concept- air pollution combines with other aspects of the social and physical environment to create an inequitable disease burden on more deprived parts of society; populations of areas with low socioeconomic status are prone to exacerbated effects from exposure to air pollution, in part as they are more likely to suffer pre-existing health conditions as a result of their poorer living conditions and lifestyle, but also as they are more vulnerable, being more likely to be living in areas with higher levels of air pollution.

## **Air Quality in Cardiff Council**

Local authorities have a statutory duty under Part IV of the Environment Act 1995 & Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007 to manage local air quality. Under Section 82 of the Environment Act 1995 the Local Air Quality Management (LAQM) process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not air quality objectives are likely to be achieved.

The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138) and Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298). Where the air quality reviews indicate that the air quality objectives may not be met the local authority is required

to designate an Air Quality Management Area (AQMA). Action must then be taken at a local level and outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves.

In line with the Cardiff Council's (CC) statutory duties under Part IV of the Environment Act 1995, Shared Regulatory Services (SRS) on behalf of CC undertakes regular air quality monitoring at specifically allocated locations across Cardiff using automated and non-automated principles for ambient air Nitrogen Dioxide (NO<sub>2</sub>), Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>), Sulphur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO) & Ozone (O<sub>3</sub>).

With regards to prioritising ambient air quality sampling locations, the Council adopts a risk-based approach to any allocation of monitoring sites, considering the requirements of The Department for Environment, Food and Rural Affairs' (Defra) Local Air Quality Management Technical Guidance 16 (TG16), April 2021. The designated monitoring locations are assigned based on relevant exposure and where the certain Air Quality Objective levels for a particular pollutant applies. TG16 states that annual mean objectives should apply at "All locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, car homes etc."

## Monitoring Networks

In 2020, Cardiff had four automatic air quality monitoring sites, equivalent to Automated Urban Rural Network (AURN) standards, located at Frederick Street in the City Centre, Richard's Terrace, just off Newport Road, Castle Street and Lakeside Primary School.

### **Cardiff Frederick Street (Urban Background)- AURN 1**

The site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub> feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

### **Richard's Terrace, Newport Road (Urban Traffic)- AURN 2**

The site monitors on a 24/7 basis measuring levels of NO<sub>2</sub> & PM<sub>10</sub> at that location, feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

### **Cardiff Castle Street (Urban Traffic/ Roadside)**

Commissioned in October 2020 with the financial support of Welsh Government. The site monitors on a 24/7 basis measuring levels NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location, forming part of the Welsh Air Quality Network.

### **Cardiff Lakeside (Urban Background)**

The site monitors on a 24/7 basis measuring levels of Polycyclic aromatic hydrocarbons (PAH) at that location, feeding data directly into Defra's PAH Digital (solid phase) Network. SRS serve as a local site operator to this site, however data interpretation is sanctioned by the consultants Ricardo Energy and Environment Ltd, whereby concentrations are compared to the national air quality objective for B[a]P in ambient air, based on an annual mean concentration of 0.25 ng/m<sup>3</sup>. Details can be found in the [UK Air Quality Strategy \(Defra, 2007\)](#). Therefore, the purpose of this site and results derived are not corresponded to any of the limit values outlined for the purposes of LAQM in Wales.

Summarised results for various pollutants for the outlined automatic monitoring stations can be found at <http://www.welshairquality.co.uk> & <https://uk-air.defra.gov.uk/interactive-map>

### **AQ Mesh Analysers**

In addition to the newly commissioned automated monitoring station on Castle Street, Cardiff Council has acquired the use of 7 near real time indicative air quality analysers. 5 analysers were purchased with the financial support of Welsh Government and the 6<sup>th</sup> & 7<sup>th</sup> analysers were facilitated by the SRS who had successfully accrued funding via a S106 planning contribution. The analysers have been specifically placed and represent relevant exposure. The monitors are located at the following locations:

#### **Clean Air Monitors**

- Westgate Street;
- Lower Cathedral Road;
- Tudor Street;
- North Road; and
- Penarth Road

#### **S106 Monitors**

- Llandaff – Bridge Street; and

- Canton – Lansdowne Rd (installed 2021).

The analysers continuously monitor for Nitric Oxide, Nitrogen Dioxide & Ozone, PM10 & PM2.5, and do so every 15 minutes (data uploaded every hour). Information regarding the specification of the monitors can be viewed at <https://www.aqmesh.com/product/>. These monitors do not form part of the regulated Welsh automated monitoring network, but as specified they are an indicative form of monitoring and a useful tool to look at datasets on a high-resolution basis. The results captured from these monitors are summarised below

Site Name	Valid Data Capture 2021 %	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> )
Westgate Street*	0	N/A	N/A	N/A
Lower Cathedral Road	100	19.9	11.1	8.5
Tudor Street	100	20	13.9	10.7
North Road	100	22.1	9.5	7.8
Penarth Road	100	12.7	11.5	9.5
Lansdowne Road, Canton**	54	25.6	16.6	11.4
Llandaff AQMA	11	12	9.3	20.72

\* Westgate Street Monitor suffered numerous technical issues which has meant data capture for 2021 was not valid. Instrument has been fully recommissioned in 2022. Similarly, technical issues were suffered with the Llandaff Monitor, resulting in poor data capture in 2021.

\*\* -data capture representative of period monitored was installed.

### Non-automatic Monitoring Sites

In 2021 there were 108 specifically allocated non automatic monitoring sites across Cardiff which monitored levels of nitrogen dioxide (NO<sub>2</sub>). These sites are supported and maintained by SRS on behalf of CC. The non-automatic sites do not provide live data; instead they consist of diffusion tubes which are placed at

each of the sites, collected and replaced on a rolling monthly basis. The results derived from the tube sampling are then averaged over the year to enable a comparison of the results against the annual average (**40µg/m<sup>3</sup>**) and 1-hour (**200µg/m<sup>3</sup> not to be exceeded > 18 times per year**) air quality objectives for NO<sub>2</sub>.

### **Summary of results collated in 2021**

**Automated monitoring-** Results highlighted in **Section 2.2** of this report indicate compliance with the relevant air quality standards applicable for the purpose of LAQM in Wales.

**Non- automated monitoring-** In 2021, compliance with the set annual average objective for NO<sub>2</sub> (40µg/m<sup>3</sup>) was achieved at all monitored locations. The results are indicative that the levels of air pollution were still being influenced from the ongoing impacts of the COVID lockdown restrictions that were in place in the first part of 2021 and have had an impact on pollution levels in Cardiff which is likely owing to traffic volumes having decreased. However it is evident that concentrations have increased compared to the results in 2020 and this is likely reflective of the easing of restrictions throughout 2021 and increased travel patterns. It is therefore likely that the concentrations recorded in 2021 were still not fully representative of a business-as-usual scenario and the results have generated a small bias/ underestimation of levels of pollution across Cardiff in 2021.

In accordance with Welsh Government's (WG) Local Air Quality Management Policy Guidance, July 2017, SRS and CC recognise that there is no defined "safe level" when describing levels of air quality. Although compliant levels were achieved at all monitored locations in 2021, subsequently as a result of COVID-19 impacts, Cardiff Council remains vigilant and will work towards sustaining/ improving these levels of compliance across the city for future years.

### **Air Quality Management Areas**

Air Quality Management Areas (AQMAs) are declared when air quality is close to or above an acceptable level of pollution, known as the air quality standard/ objective

Based on monitoring results and further detailed assessments, there are currently four Air Quality Management Areas (AQMAs) declared across Cardiff which have



all been declared due to exceedances of the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>), known to be predominantly derived from road transport sources.

1. **Cardiff City Centre**- declared 1<sup>st</sup> April 2013
2. **Llandaff**- declared 1<sup>st</sup> April 2013
3. **Stephenson Court**- declared 1<sup>st</sup> December 2010
4. **Ely Bridge**- declared 1<sup>st</sup> Feb 2007

Maps detailing the extend and fully boundaries of the 4 AQMAs are provided in Appendix D.

## Actions to Improve Air Quality

SRS and CC are very aware of the concerns for air quality impacts. SRS & CC is committed to achieving levels as low as reasonably practicable by demonstrating levels beyond the annual objectives set for pollutants. In order to improve the air quality in Cardiff, action needs to be taken across the city as a whole. The main air pollutants which cause a public health concern and primarily worsen air quality in Cardiff are particulate matter and primary/ secondary derived nitrogen dioxide (NO<sub>2</sub>), derived by transport vehicles.

Welsh Government's publication; Local Air Quality Management, Policy Guidance, June 2017 recommended two clear goals:

- (1) achieve compliance with the national air quality objectives in specific hotspots; and
- (2) reduce exposure to pollution more widely, so as to achieve the greatest public health benefit.

Collective efforts, therefore, should look beyond targeted action in localised air pollution hotspots and do this in parallel with universal action to reduce risks for everyone.

Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. After declaring an AQMA the authority must prepare a **DRAFT** Air Quality Action Plan (AQAP) within 18

months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. The AQAP must be **formally** adopted prior to 24 months has elapsed. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

In view of the statutory obligation to produce an AQAP for each AQMA, in 2019 SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy is an evolving document and coincides with Cardiff's Capital Ambition report, helping to implement and deliver the priorities outlined in the Ambition report with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).

It will be imperative that the CASAP is reviewed following the full implementation of the Clean Air Plan in order to further prioritise measures, to ensure air quality levels are continuously improved in Cardiff. Therefore, it is likely that the CASAP will need a full review and update in 2023/24

## Local Priorities and Challenges

### Clean Air Plan

In addition to Cardiff's 4 AQMAs and CASAP work, following the formal publication of Defra's UK detailed air quality plan to tackle roadside nitrogen dioxide (NO<sub>2</sub>) concentrations in July 2017, it was identified from air quality monitoring undertaken by Cardiff Council (CC) and modelled projections from WG that Cardiff would continue to exceed EU & UK Air Quality Directive Limit Values for NO<sub>2</sub> beyond 2020. The report detailed modelled projections from the Joint Air Quality Unit (JAQU) which showed continued non-compliance of the national

annual average NO<sub>2</sub> standard by 2021 along identified road networks. The roads which have been modelled as exceeding the annual limit value are the A4161, the A4232, the A4234, the A470 and the A48. These areas of exceedence are also featured in the CAS & Action Plan document as any mitigation measures implemented on the referenced road links will have an impact on the LAQM AQMAs.

As a result of the detail in the UK Plan, and a subsequent High Court ruling, in March 2018, under Part IV of the Environment Act 1995, Section 85(7), WG issued a formal direction to CC to address its air quality concerns, with particular reference to the specified 5 road links. The direction has been governed by the Welsh Minister for Environment who has determined that the direction deemed necessary to meet obligations placed upon the United Kingdom under the **EU Ambient Air Quality Directive (2008/50/EC)**.

The Direction specified that CC had to undertake a feasibility study in accordance with the HM Treasury's Green Book approach, to identify the option which will deliver compliance with legal limits for nitrogen dioxide in the area for which the authority is responsible, **in the shortest possible time**.

Cardiff Council has developed a Clean Air Project Team who have met the necessary reporting requirements outlined by the Direction.

The results of the local modelling presented in the Initial Plan, differed to that undertaken by Defra using the Pollution Climate Mapping model. Defra's modelling identified two road links under baseline conditions which were projected to show non-compliance beyond 2021, namely the A48 and the A4232. The localised modelling identified only one road link under baseline conditions projected to show non-compliance beyond 2021, this being the A4161 Castle Street, in the City Centre.

Within the Initial Plan Report a long list of measures developed from the CASAP were qualitatively assessed against a primary objective of achieving compliance with set air quality objectives in the shortest possible time. The measures were considered against secondary objectives and were subjected to further qualitative assessments against the WeITAG Well-being Aspects.

The Council's published [Full Business Case](#) (Final Clean Air Plan) documents early intervention measures as well as aspired measures the Council are

endorsing to improve localised air quality on the outlined A4161 Castle Street with a vision of improving citywide air quality levels. These measures include;

- Implementation of Electric Buses – 36 Electric Buses to be implemented on a number of routes within the City Centre;
- Bus Retro Fitting Programme;
- Taxi Mitigation Scheme;
- City Centre Transportation Improvements; and
- Active Travel Measures.

The Clean Air Plan initially demonstrated that the outlined package demonstrates the greatest level of compliance on Castle Street, with  $31.9\mu\text{g}/\text{m}^3$  forecasted in 2021 as a result of the implementation of the measures. In addition to achieving compliance on Castle Street, the impact of the package of measures was also been modelled at local air quality monitoring locations, including those locations within existing Air Quality Management Areas (AQMAs). The results of the modelling indicated that all monitoring locations are expected to have concentrations below the  $40\mu\text{g}/\text{m}^3$  which further demonstrates that the package of measures will improve local air quality including within existing AQMAs.

A key component of the Clean Air Plan to deliver compliance was the full implementation of the City Centre Schemes, particularly the City Centre North (Castle Street) Scheme. The schemes would establish a high quality active travel infrastructure for the city and improve connectivity between key developments by strategically aligning bus routes and enhancing links with the new Transport Interchange. These schemes were due to commence in early 2020, prior to the onset of the COVID pandemic.

In June 2021 Cabinet approved the construction of the original City Centre North Scheme as detailed in the Clean Air Plan, albeit on an interim basis. The decision to install the scheme as an interim measure was done so on the basis it would be necessary to assess any residual impacts following a full post Covid recovery period, to ensure that no detrimental impacts in terms of congestion and air quality would emerge.

Following implementation of the interim scheme the Council has maintained regular monitoring and assessment of traffic and air quality impacts on Castle Street to demonstrate that compliance is being maintained on Castle Street.

Constant dialogue and ongoing collaboration with Welsh Government officials has been to ensure that the Plan remains on course to deliver compliance in the shortest possible time.

In order to formalise a time period to bring forward a permanent scheme on Castle Street, the Welsh Government have issued the Council with a further legal direction under Part IV of the Environment Act 1995.<sup>3</sup> This direction sets on measures the Council needs to implement to ensure that compliance for the NO<sub>2</sub> limit value on Castle Street is maintained.

### **Electric Buses**

Cardiff Bus procured 36 EV buses Cardiff Council has been successful in supporting the transition of buses on the Cardiff network to becoming fully electric. Cardiff Bus were enabled to introduce 36 new electric buses into their fleet from January 2022. It was delivered through a collaboration between Cardiff Bus and Cardiff Council after a successful bid for funding from the Department for Transport's (DfT) Ultra-Low Emissions Bus (ULEB) Scheme that received funding of £5.7m

### **Bus Retrofit Scheme**

Following an open application process which ended on the 31<sup>st</sup> December 2020, and subsequent review process, two application submissions were deemed successful. Here 80% funding to cover capital costs has been awarded to two bus operators/ companies, a total of £561,612 awarded. Here

£191,920 has been awarded to Cardiff City Transport Services Ltd (Cardiff Bus) to retrofit 20 buses, and £369,692 has been awarded to Red and White Services Ltd, T/A Stagecoach South Wales to retrofit 29 vehicles.

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<sup>3</sup> <https://gov.wales/environment-act-1995-activity-ensure-nitrogen-dioxide-compliance-air-quality-direction-2022-cardiff>

Both operators completed the programme of works in Q4 of 2021, and has ensured that some of their older buses have improved their NOx emissions by some 90%.

### **EV Taxi Scheme**

In Q3 of 2021 the Council procured 5 fully electric wheel chair accessible Dynamo Hackney Carriage Taxis. In partnership with a local vehicle hire company the Council launched an EV Taxi Lease Scheme with for licensed Cardiff drivers to take up an EV Taxi. This scheme was initially launched in January 2022. At the time of writing this report the Council is working further with our hire partner to further incentivise the scheme to improve take up of the scheme.

## **How to Get Involved**

CC welcomes any correspondence relating to air quality enquiries or concerns. Shared Regulatory Services (SRS) Specialist Services Team represents CC for local air quality management and therefore is contactable using the following email address [AirQuality-SRSWales@valeofglamorgan.gov.uk](mailto:AirQuality-SRSWales@valeofglamorgan.gov.uk)

For any enquiries surrounding Cardiff's Clean Air Plan, specifically the roll out of mitigation measures please contact Cardiff's Clean Air Team on [cleanairproject@cardiff.gov.uk](mailto:cleanairproject@cardiff.gov.uk).

Hourly and Monthly average monitoring data for pollutants measured is available at <https://airquality.gov.wales/>

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# 1 Actions to Improve Air Quality

## 1.1 Previous Work in Relation to Air Quality

### Phase 1

The Local Air Quality Management regime commenced with the Air Quality Regulations 1997, which came into force in December of that year. These Regulations were revoked and superseded by the current Air Quality (Wales) Regulations 2000 (as subsequently amended in 2002).

The first phase of the review and assessment process concluded that for six of the seven pollutants included in the regulations there was little or no risk of the objectives being breached and that Air Quality Management Areas (AQMAs) for these pollutants were not necessary. Measures taken at the national level would be sufficient to ensure that there would be no local “hot-spots” of these pollutants and therefore local controls in addition to the national measures would not be required.

However, for the seventh of these pollutants, nitrogen dioxide (NO<sub>2</sub>), it was concluded that national control measures such as vehicle emission and fuel standards, controls on industrial emissions, etc., would not, of themselves, be sufficient to ensure that the air quality objectives for this pollutant would not be met in all areas of Cardiff.

Whilst the vast majority of the area would meet the objectives, there were predicted to be local “hot-spots” close to heavily-trafficked road junctions where there were buildings close to the road and significant amounts of queuing traffic where the objectives would not be met.

As a result, four AQMAs were declared, each having been declared on the basis of measurements and modelling showing predicted breaches of the annual average objective for NO<sub>2</sub>. These AQMAs were known as;

- The Cardiff West AQMA
- The Newport Road AQMA
- The Philog AQMA
- The St Mary Street AQMA

The first three of these came into force on 1st December 2000 and the latter on 1st September 2002. AQAPs the first three were published in November 2002 and for St Mary Street in February 2010.

## **Phase 2**

The Council's 2003 USA concluded that for five of the seven pollutants regulated under the LAQM regime there was no evidence to suggest that local "hot-spots" for these pollutants had been missed in the first phase of the review and assessment process and that there was no need to consider these pollutants further at this time.

The 2003 USA also concluded that no local hot-spots of nitrogen dioxide had been overlooked during the first phase of review and assessment and that further detailed assessment of this pollutant was not necessary.

However, whilst the USA concluded that there was no evidence to suggest a likely breach of the 2004 objective for particulate matter (PM10), there was considerable doubt that the provisional 2010 objectives for PM10 would be achieved.

As a result of the conclusions of the 2003 USA the Council issued Progress Reports in 2004 and 2005.

## **Phase 3**

Following the 2006 USA, the Council published and consulted upon an Air Quality Management Area (AQMA) Review during the autumn of 2006. This concluded that two of the four AQMAs could be revoked and that the then Cardiff West AQMA should be reduced in size and renamed as the Ely Bridge AQMA. Orders making the changes came into force on 1st February 2007.

The 2007 Progress Report highlighted a potential problem with regard to nitrogen dioxide concentrations on Newport Road in the immediate vicinity of Stephenson Court, where concentrations had been marginally, but consistently, above the Air Quality objective for a few years. It was concluded that the possibility of declaring a new AQMA would be assessed in the 2008 Progress Report.

The monitoring data for the Stevenson Court area presented in the 2008 Progress Report led to the conclusion that a further "watching brief" would be kept with a view to reaching a firm conclusion once ratified monitoring data for the 2008 calendar year became available.

The monitoring data for 2007 presented in the 2008 Progress Report provided reassurance that the Council's decisions in respect of the 2006 AQMA Review were soundly based.

#### **Phase 4**

The 2009 USA concluded that a Detailed Assessment for the Stephenson Court area of Newport Road was required as the annual mean concentration of nitrogen dioxide at three sites representative of relevant exposure in the area were above the air quality Objective.

A Detailed Assessment for this area was consulted upon during the summer of 2010 and the AQMA came into force on 1st December 2010.

The Council's 2010 Progress Report was submitted in December 2010 and the 2011 Progress Report in June 2011.

The 2011 Progress Report highlighted abnormally high NO<sub>2</sub> 2010 annual mean concentrations across the Council's monitoring network which could not be attributed to a particular source and evidence was presented to show that this was a regional issue probably associated with a prolonged period of unusually cold weather during November and December 2010. After dialogue with Welsh Assembly Government with regard to the conclusions reached about this data it was concluded that the Council would proceed to Detailed Assessments for the Llandaff and Westgate Street areas of the city and review the situation with regard to other exceedences when 2011 data is available and reported in 2012.

A Further Assessment for the Stephenson Court AQMA was submitted to WAG for review in December 2011, i.e. one year after the AQMA was declared, in compliance with Section 84(2)(a) of the Environment Act 1995.

#### **Phase 5**

The 2012 USA was the first report in Phase 5 of the review and assessment process. Monitoring data for 2011 largely confirmed that the annual mean concentrations of nitrogen dioxide previously reported for 2010 were unusually elevated, both locally and regionally, and local concentrations had returned to more typical values in 2011. Detailed Assessments in respect of nitrogen dioxide in Westgate Street and for the Llandaff area were consulted upon during the summer of 2012 and as a result a new AQMA for Llandaff was declared on 1st April 2013 and Westgate Street was incorporated into the St Mary Street AQMA; this latter AQMA is now named Cardiff City Centre AQMA.

The Council's 2013 Progress Report recommended proceeding to a Detailed Assessment for the Fair oak Road Roundabout in the Plasnewydd Ward of the city as monitoring data over previous years indicated the need. This was submitted for review during 2014. The Assessment concluded that, as monitoring data for 2013 had returned to Objective compliance, there was no need to declare an AQMA at that time. It was proposed to continue monitoring in the area and review the results year-on-year.

The Further Assessment for the City Centre AQMA was submitted in April 2014 and the conclusion that the declaration of the AQMA was justified was accepted.

A Further Assessment for the Llandaff AQMA was also submitted for review in 2014. This concluded that the declaration of the AQMA was justified based upon monitoring data available at the time. However, as monitoring data for 2013 showed compliance with the Objective, it was concluded that there was no need to develop an Action Plan at that time. Monitoring would continue and the situation would be reviewed year-on-year.

In summary, there are currently four AQMAs in Cardiff; all have been declared in respect of NO<sub>2</sub> resulting from road-traffic emissions:

- Cardiff City Centre AQMA
- Ely Bridge AQMA
- Stephenson Court AQMA
- Llandaff AQMA

## **Phase 6**

The 2015 USA was the first report in Phase 6 of the review and assessment process. Monitoring data for 2014 largely confirmed that the annual mean concentrations of nitrogen dioxide previously reported for 2010 were unusually elevated, both locally and regionally, and local concentrations had returned to more typical values in 2011.

Monitoring data for 2015 indicated that annual mean concentrations of nitrogen dioxide were not unduly elevated during the year and that in some locations concentrations may have been lower than expected. The 2016 Progress Report showed a number of sites representative of relevant exposure with exceedences of the 40µgm<sup>3</sup> annual mean objective, however these sites and recorded exceedences were not out of character as were predominantly contained within the declared AQMAs.



## 2017 Annual Progress Report

There are a number of sites representative of relevant exposure with exceedences of the NO<sub>2</sub> annual mean objective (40µg/m<sup>3</sup>). These sites are predominantly contained within the declared AQMAs. However, there are four monitoring locations (Site IDs 172, 180, 181, 185) which are not located within AQMAs.

Site 172 (Ocean Way) is a kerbside location situated up to 650m from any relevant exposure, used to examine potential impacts of traffic resulting from industrial development in the area.

Sites 180 & 181 were implemented due to new developments with the potential for adverse air quality impacting the amenity of future occupants (Windsor House, Windsor Lane & Fitzalan Court, Newport Road). Both developments were under construction in 2016, therefore influencing any datasets recorded. Only recently has the student accommodation at Windsor House been completed and construction still continues at the Fitzalan Court site.

Site 185 is not representative of relevant exposure and does not apply to the annual mean objective set for NO<sub>2</sub>. Therefore, datasets collected at this monitoring location would apply to the 1-hour objective set for NO<sub>2</sub> (200µg/m<sup>3</sup>, not to be exceeded more than 18 times per year).

Monitoring for other pollutants did not result in other exceedences of National Air Quality Standards.

Due to technical issues, Cardiff City Centre's AURN site recorded low data capture for PM<sub>10</sub> measured by a TEOM- FDMS sampler. The total data capture for the year was 47.1%. As outlined in LAQM (TG16) the data from the sampler has been annualised in accordance with Box 7.9 and the 90.4th Percentile value has been given to examine the 24 hour objective.

It was decided not to revoke the Llandaff AQMA. Since the declaration of the Llandaff AQMA in 2013, results have highlighted that levels of NO<sub>2</sub> are generally improving and are now below the national objective of 40µg/m<sup>3</sup> at locations of relevant exposure. Based on recent results the Council could be minded to revoke the AQMA. However, the 2017 APR highlighted that any decision made to revoke the AQMA needs to be mindful of the potential development of the strategic LDP sites to the north of the AQMA, Plasdwr and BBC Studios. Whilst detailed air quality assessments undertaken as part of the planning

process have modelled that there is unlikely to be a detrimental impact on air quality levels in the AQMA, this can only be fully verified through on going monitoring.

Therefore, in an effort to reassure local residents and to be totally satisfied that levels will remain compliant with the NO<sub>2</sub> standard, SRS on behalf of CC reviewed the non-automatic monitoring network of NO<sub>2</sub> diffusion tubes for 2018. As a result, new and amended monitoring sites have been allocated. Officers will further assess the potential to implement real-time capabilities in the Llandaff AQMA as part of the Council's statutory duties under Part IV of the Environment Act 1995. There are now four monitoring locations within the Llandaff AQMA.

Monitoring for other pollutants did not result in other exceedences of National Air Quality Standards.

### **2018 Annual Progress Report**

Monitoring data for 2017 indicates that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure, within the already established AQMAs, continue to be elevated or exceed the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>).

The datasets indicate that the annual average objective for NO<sub>2</sub> was breached at monitoring locations outside of the existing AQMAs (Sites 172, 179, 180 & 181).

It is felt that at this stage no further detailed assessments are required;

Site 172 is placed on Ocean Way to monitor potential impacts of traffic resulting from industrial developments in the area. The site is not representative of relevant exposure, the nearest being >650m away. For 2018 Site 172 has been revoked from the monitoring network as it is felt that a strong trend of data has been collected at this location.

The 1-hour objective for NO<sub>2</sub> need only apply to site 179.

Sites 180 & 181 were implemented to monitor air quality levels and therefore the potential impacts to future occupants at new development sites. These developments were still under construction in 2017 and therefore datasets collected will be negatively influenced.

The report also documented the works ongoing to produce the CASAP document, as well as outlining the development of the Feasibility Study in line with the Legal Direction received from the Welsh Minister.

### **2019 Annual Progress Report**

Monitoring undertaken in 2018 confirmed annual average NO<sub>2</sub> levels continued to breach or encroach upon set limit values/ air quality standards within already established AQMAs (7 exceedances of the annual mean objective in total).

The report provided an update regarding the completion of the Clean Air Strategy and Action Plan document (CASAP), as well as an update of mitigation measures proposed to address air quality concerns for Cardiff. The report also documented the finalisation of the Full Business Case (FBC) and its outcome in accordance with Welsh Government's issued Legal Direction.

### **2020 Annual Progress Report**

The 2020 reported identified that in 2019, out of the 100 diffusion tube monitoring locations, 6 monitoring sites recorded exceedances of the annual average objective set for NO<sub>2</sub> (40 µg/m<sup>3</sup>). All 6 monitoring locations were recorded within the already established City Centre and Llandaff air quality management areas (AQMA).

The report provided an update on the monitoring undertaken at 9 schools across Cardiff where previous studies from Client Earth identified the schools to be in close proximity to road links likely to cause exceedances of the NO<sub>2</sub> air quality standards. Monitoring undertaken at the 9 schools fully demonstrated continuous compliance with the annual average air quality standard for NO<sub>2</sub> for two success years. The report also provided an update of monitoring undertaken at a further 6 schools as part of a citizens science project funded by Natural Resources Wales. Again monitoring at these 6 schools demonstrated compliance with the objective for NO<sub>2</sub>.

The report documented the approval from Welsh Government of the Final Clean Air Plan and awarding of funding to ensure the Council delivered compliance with the NO<sub>2</sub> limit value under the legal duties of the Ambient Air Quality Directive.

### **2021 Annual Progress Report**

Monitoring data for 2020 indicated that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure, within the already established AQMAs, all showed compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). The results are indicative that the impacts of the COVID lockdowns and restrictions therein have had an impact on pollution levels in Cardiff which is likely owing to traffic volumes having decreased. It is therefore likely that the concentrations recorded in 2020 are not

representative of a true business as usual scenario and the results have generated a bias/underestimation of levels of pollution across Cardiff in 2020.

## 1.2 Air Quality Management Areas

Air Quality Management Areas (AQMAs) are declared when air quality is close to or above an acceptable level of pollution (known as the air quality objective (Please see Appendix A)). After declaring an AQMA the authority must prepare an Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

A summary of AQMAs declared by Cardiff Council can be found in **Error! Reference source not found.** Further information related to declared or revoked AQMAs, including maps of AQMA boundaries are available online at <https://uk-air.defra.gov.uk/aqma/list>.

Table 1 - Declared Air Quality Management Areas (AQMAs)

AQMA	Relevant Air Quality Objective(s)	Comments on Air Quality Trend	Description	Action Plan
Cardiff City Centre	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019.	Former St Mary Street AQMA with the addition of Westgate Street in Cardiff City Centre	<a href="#">Cabinet 13 June 2019 Clean Air Appendix 1 Clean Air FBC.pdf (moderngov.co.uk)</a>
Llandaff	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019.	Centre on Cardiff Road through Llandaff village	
Stephenson Court	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019.	From NE and NW boundaries of Stephenson Court, NW boundary of Burgess Court, NW and SW boundaries of Four Elms Court, SW corner of Four Elms Court south across Newport road to the junction with Orbit street, West across Newport Road to the SE corner of Stephenson Court	
Ely Bridge	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019.	A number of residential premises along the A48 Cowbridge Road West,	

AQMA boundary maps within Cardiff are included in Appendix D.

### 1.3 Implementation of Action Plans

Each of the outlined AQMAs was declared as a result of road-traffic derived Nitrogen Dioxide (NO<sub>2</sub>).

Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. After declaring an AQMA the authority must prepare a **DRAFT** Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. The AQAP must be **formally** adopted prior to 24 months has elapsed. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

In view of the statutory obligation to produce an AQAP for each AQMA, in 2019 SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy is an evolving document and coincides with Cardiff's Capital Ambition report, helping to implement and deliver the priorities outlined in the Ambition report with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).

Table 2 - Progress on Measures to Improve Air Quality

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
<b>Modal Shift &amp; Influencing Travel Choice</b>											
.1	Increase Bus Use	Alternatives to private vehicle use	Proposals are in place for a park and ride system at Junction 33 which would look to intercept traffic on the A470, north Cardiff.	CC	No definite Start Date		Bus patronage figures produced via telematics	Unknown	The preparation of a draft Park and Ride Strategy for Cardiff has begun, and the Park and Ride at Junction 33 is being planned for delivery by the developer	Ongoing	



No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
1.2	Promotion of cycling and walking	Promoting Travel Alternatives	DRAFT Cycling Strategy sets out to double number of cycling trips by 2026; 9.2% modal share in 2015 to 18.4% in 2026. Five cycleways proposed. The INM prioritises cycling and walking routes over 15 year period.	CC	Ongoing		Cycle trips generated/ questionnaires	Unknown	Draft report and Cabinet Report seeking approval to undertake statutory consultation has been prepared and will be considered by Cabinet in JThe number of responses and technical work required means that it will not be possible to evaluate	Ongoing	

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress in Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		comments and make appropriate adjustments to draft Map and complete it in time to meet Welsh Government's (WG) 31st December 2021 deadline. WG officers to be informed that Cardiff unable to meet 31st December 2021 deadline and Council officers will seek									

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									extension of deadline in light of exceptional level of engagement on Cardiff's Active Travel Network Map		
3	School Travel Plans		CC has engaged with 'Living Streets' charity and have developed a 'WOW' (Walk Once a Week) scheme in 7 allocated	CC & Living Streets Charity	Ongoing		Report updates from Living Streets	Unknown	In 2021 this has increased to 43 schools	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			schools in Cardiff.								
1.4	School Travel Plans		Cardiff Council's Schools Streets Project and its Traffic Regulation Order (TRO) pilot project.	CC	Ongoing		Monthly average NO <sub>2</sub> levels examined at School property, Inside TRO and Outside TRO zone at residential facades.  Questionnaires for school pupils and parents.	Unknown	15 schools assigned to the TRO Zone pilot project.	End of 2022 (Subject to funding, possibly longer)	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
1.5	Personalised Travel Planning	Promoting Travel Alternatives	Public Service Board Staff Charter.	Public Health Wales/ Vale and Cardiff Health Board	Working initially through Cardiff Public Services Board, a Healthy Travel Charter for Cardiff has been developed with major public sector employers and was launched in April 2019.		Modal shift counts.  Number of participating public sector organisations.	Unknown	The Charter was signed by 11 public sector organisations at launch in April 2019, employing over 33,000 staff, with additional public and private sector organisations subsequently invited to sign up to the Charter.		
1.6	Increase awareness of air quality concerns	Public Information	Cardiff 'car-free' day	CC	Completed 2019		Air Quality Measurements	No target	When comparing Sunday 19th May to Car-Free Day event 12th May, the daily average reduction for NO2 is as follows;  Duke Street/ Castle Street- 16.11%  Stephenson Court on Newport Road- 28.15%		Try to geographically expand and hold car-free days more regularly in Cardiff.

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									Westgate Street- 13.62% Lower Cathedral Road- +9.14%		
1.7			Tredegarville CIW Primary School "Green Wall" project.	CC	Complete	August 2019	Air quality levels recorded at the school via non-automated principle diffusion tubes.	No target	Successful application under the Landfill Communities Fund to cover the supply and installation of outdoor green walls at Tredegarville CIW Primary School. Successfully installed August 2019.  Additional Schools have been included in further Living Wall Projects in 2022.		Investigate monthly average diffusion tube results following implementation.
1.8			Dusty Forge/ Kitchener Primary School	CC	Ongoing	November 2020	Air quality levels recorded via non-automated	No Target	Welsh Government's 'Local Places for Nature' scheme. In summary it is proposed to install green walls		Investigate monthly average diffusion tube

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
							principle diffusion tubes.		at 2 Council owned buildings in areas of poor air quality and develop a citizen science project with the local community to monitor changes in air quality and biodiversity.		results following implementation
Infrastructure											
2.1	Bus Route Improvement	Transport Planning and Infrastructure	City Centre Improvement Schemes (3 elements East side/ City Centre North/ City Centre West)	CC & WG	2018	2019 (City Centre West Initiated)  2020 (city centre north and east initiated)	FBC	To ensure development does not cause any adverse impact and where possible reduce levels to as low as reasonably practicable.	City Centre West (central Sq Scheme) continued construction throughout 2021, with view of completion by 2023 for opening of Bus	2024	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
								<p>Package of City Centre Schemes deemed to improve air quality levels for Castle Street. Revised modelling shows levels of 28 µg/m<sup>3</sup> will be achieved.</p>	<p>Interchange in 2023. Castle Street remained closed through most of 2021, with interim scheme installed and opened from Nov 2021. City Centre East scheme commenced site preparation works in November 2021, with main works</p>		



No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									commencing early 2022.		
2.2	Public Cycle hire Scheme		Ovo Bike Hire Scheme	CC	Ongoing		Daily reports on usage provided to CC. 150,000 rentals reported since March 2018.	Unknown	50 docking stations installed providing 500 bicycles for public use. Extra 500 bicycles assigned to Cardiff for the end of Summer 2019. Completion of the rollout of the Ebike	Completed and continues to be expanded and enhanced.	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
2.3	Cycle Network		Proposed Cycleways	CC & WG	Ongoing		Cycling trip counts.	3.5% modal shift which aligns with the assumptions	fleet by September 2021, delivering a new fleet of 125 bikes in up to 15 rental stations. Completion was delayed into Q1/2 of 2022	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
								derived in the feasibility study.	Road ( <b>works are complete for phase 1 of cycleway 1.Phase 2 will be constructed in 21/22</b>  Phase 1 between Cowbridge Road and Western Avenue via Sophia Gardens and Pontcanna Fields has been fully delivered and the Council		

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress in Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>has completed a detailed consultation on the options for Phase 2 which will connect Western Avenue with Llandaff village.</p> <p><b>Pop Up Cycleways</b></p> <ul style="list-style-type: none"> <li>•Cross City Scheme complete and ready for junction switch on when traffic</li> </ul>									

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress in Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		conditions allow •Bay Pop Up complete, now requires new street lighting to be compliant with safety regulations. •Scheme to open officially once the lighting work is complete  Hailey Park •Scheme awaiting tender									

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress in Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>following consultation outcome</p> <p>Cycleway 5</p> <ul style="list-style-type: none"> <li>•Scheme out to consultation</li> <li>•Scheduled to be on site Q1/2 2022-23</li> </ul> <p>Cycleway 1</p> <ul style="list-style-type: none"> <li>•Scheme entered on site September 2021</li> </ul>									

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									<ul style="list-style-type: none"> <li>•Work progressing well</li> <li>•Controlled Parking Scheme to follow early 2022</li> </ul>		
4	Public transport improvements- interchanges stations and services		New Cardiff Central Interchange development	CC	Ongoing		Detailed AQAs quantifying the level of impact to air quality levels.	To ensure development does not cause any adverse impact and where possible reduce levels to as low as reasonably practicable	Construction of the Interchange has continued throughout 2021, and remains on course to be completed in 2023.	S106 funding acquired for the amount of £10,000 to enhance air quality	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
										monitoring capabilities.	
2.4	Public transport improvements- interchanges stations and services 20 mph zones		Cardiff Capital Region Metro -Proposed by WG (Rail and bus based rapid transit routes).	CC	Ongoing			Unknown-supporting AQA will be a likely during the design and application stages	Good progress has been made to identify measures to encourage the use of sustainable travel as the economy recovers in partnership with the Welsh Government, the Burns Delivery Unit, Transport for Wales, City Region, public transport operators and key stakeholders. These measures include corridor improvements for Active Travel, bus priority, ongoing financial support for the bus services, integrated ticketing pilot between Cardiff and Newport in 2022, plans for		Ongoing



No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									new transport interchanges (Cardiff Central, Waungron and Cardiff Parkway) and study work on new Metro station and line improvements.		
			Implement further speed restrictions and enhance those already established "20mph Zones"	CC & WG	Ongoing		Safety figures & Monthly Average Diffusion tube results.	Unknown	CC has introduced 'signs only' 20mph limits in Cathays and Plasnewydd area. Approach coincides with the Safe Routes to School Programme.	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Page 226									Plans are in place to hopefully expand 20mph limit areas in Grangetown. This is complete.		
	2.6	20 mph Zones	Traffic Management	CC	Implementation		Realtime Monitoring	Unknown	Cardiff North Area has been included as a Pilot Area for WG assessment into 20 mph where existing limits are 30 mph. This	2022	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									study will assist in National roll out of 20 mph as default urban speed limit.		
2.7	20 mph Zones	Traffic Management		Welsh Gov	Implementation		Realtime Monitoring	Unknown	Cardiff North Area has been included as a Pilot Area for WG assessment into 20 mph where existing limits are 30 mph. This study will assist	2022	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
<b>Lower Emission Vehicles</b>											
3.1	Public Vehicle Procurement		Ultra-Low Emission Bus (ULEB) fund made available by the Department for Transport (DfT).		Ongoing	Three year rolling programme 2019-2021	Improvements to air quality levels (NO <sub>2</sub> ) monitored by indicative methods by CC at sensitive receptor locations on specified routes	Approximately >2µg/m <sup>3</sup> reductions in NO <sub>2</sub> sensitive receptor locations along Westgate Street	Application received by DfT and deemed successful. Initial buses delivered in November 2021 and all 36 launched in January 2022.		
3.2	Company Vehicle Procurement- Prioritising uptake of low emission	Promoting Low Emission Transport	Sustainable fuels strategy- assessment of Cardiff Council vehicle fleets	CC, DfT & Cardiff Bus	Ongoing	Economic savings and reduced Carbon footprint	Unknown	End of 2021 59 charge points across 7 Council sites fully implemented.	Ongoing		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
	vehicles/ EV recharging							<p>6 Rapid chargers which will support charging for 12 refuse Vehicles.</p> <p>7 E RCV in service with.</p> <p>11 EVs on order for purchase or being delivered prior 31st March. 1 on pre-order, which will be in by the end</p>			

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
								of the year. The total will be 37 on fleet by the end of the year, which are all purchased, owned vehicles.			
3.3	EV recharging		Increase EV charging points for Cardiff residents/workers.	CC	Ongoing		EV vehicle counts/ EV point usage.	Unknown	Progression of residential EV charging locations has ensured that 15 locations with a total of fast charging points have been installed across the City. Second	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									<p>phase of 5 sites with 1 charge points was being progressed before being impacted by COVID – these are now planned for late August/ early September.</p> <p>6 Rapid Charging stations have been installed with site operator Osprey</p>		

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress in Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>Charging at locations in the City Centre and Bay .</p> <p>Two additional schemes looking will increase to increase the number of publicly accessible charging stations in the city from 58 to around 75 before the end 2022.</p>									



No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
3.4	Taxi incentive to operate cleaner vehicles		Improve the emission standard profile of Cardiff's licensed Hackney and Private Hire Vehicles. Clean Air Funding allocated to provide EV grants for taxis.	CC	Ongoing		Uptake for the funding.	To ensure development does not cause any adverse impact and where possible reduce levels to as low as reasonably practicable	Due to COVID-19, the launch of the scheme was impacted and ongoing discussions with WG on use of allocated funding..		To achieve greatest air quality improvements zero emission or ULEV classified vehicles need to be incentivised.
3.5	Cardiff Clean Bus Retrofit Scheme 2020-21		Improve the emissions profile by improving the	CC & WG	COMPLETED 2021/22		Number of bus vehicles converted;	FBC identifies that the retrofit alone would achieve compliance	Scheme went live on 1 <sup>st</sup> October 2020 and a total of 49 buses have been		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			euro standard composition of bus fleets operated in Cardiff. Via a competitive tender application process, Cardiff Council will administer a retrofit scheme aimed at improving the emission output of bus vehicles					on Castle Street 39.6 µg/m <sup>3</sup> with 150 vehicles retrofitted.	retrofitted as of September 2021.		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			operated in Cardiff.								
<b>Policy</b>											
4.1	Citywide strategy to reduce emissions and improve air quality		Cardiff Clean Air Strategy and Action Plan (CASAP)		2018		Recorded Improvements to air quality levels (NO <sub>2</sub> ) monitored by indicative methods by CC at sensitive receptor locations	Annual average NO <sub>2</sub> levels to be recorded at <35µg/m <sup>3</sup> at residential façade locations with specified AQMAs.	Finalised and approved by Cabinet. Submitted to Welsh Government for review.	Ongoing	
4.2	Taxi Licensing Conditions	Policy Guidance and Development Control	Amendments made to Cardiff taxi licensing conditions to	CC	2019- 2020		Taxi fleet composition %.		Impacted owing to COVID impacts on Taxi trade	Ongoing and will need to be reviewed in 2023	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			promote a cleaner fleet.						during 2020-21		
4.3	Transport White Paper	Promoting Low Emission Transport	The Transport White Paper was launched on 15 January 2020 and lays out an ambitious 10-year plan to tackle the climate emergency, reduce congestion and improve air quality.	CC	2020- 2030		Improved air quality levels/ journey time. Sustainable modes patronage.	To generate air quality levels as low as reasonably practicable.	Published document 2020.		



## 2 Air Quality Monitoring Data and Comparison with Air Quality Objectives

### 2.1 Summary of Monitoring Undertaken in 2021

#### 2.1.1 Automatic Monitoring Sites

In 2021, Cardiff had four automatic air quality monitoring sites located at;

- Frederick Street in the City Centre;
- Richard's Terrace, just off Newport Road;
- Castle Street, Cardiff City Centre; and
- Lakeside Primary School.

Details for these sites can be found in Table 3 and <https://airquality.gov.wales/>.

A further seven indicative AQMesh monitors were also located at various locations across the city. AQMesh analysers continuously monitor for Nitric Oxide, Nitrogen Dioxide & Ozone, PM10 & PM2.5, and do so every 15 minutes (data uploaded every hour). The data from the monitor is sent to a cloud server where it is corrected for temperature, pressure, and relative humidity as well as cross gas interference. Details of these locations are described in table 2.1. It is important to note that the readings from indicative monitors give an indication of air quality only. Although useful for understanding air quality trends and patterns, they are not used for formal comparisons to Air Quality Objectives (AQO).

Further information on AQMesh can be found at <https://www.aqmesh.com/>. Technical issue's were experienced at two AQMesh sites during 2021, Westgate Street and Llandaff AQMA. Insufficient data was captured at these sites to allow data to be accurately represented within this report.

#### **Cardiff City Centre, Frederick Street (Urban Background)- AURN 1**

The site was commissioned in May 1992 and monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub> feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

**Richard's Terrace, Newport Road (Urban Traffic)- AURN 2**

The site monitors on a 24/7 basis measuring levels of NO<sub>2</sub> & PM<sub>10</sub> at that location, feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

**Castle Street, Cardiff City Centre (Roadside)- Site 3**

The site was commissioned in October 2020 and monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location forming part of the Welsh Automated Monitoring Network.

Both sites AURN 1 & 2 are subject to six-monthly QA/QC audits by AEA, DEFRA's appointed contractor, and calibration gases are all traceable to National Standards. Calibrations have been carried out fortnightly by the appointed contractor.

**2.1.2 Non-Automating Monitoring Sites**

**SRS on behalf of Cardiff Council undertook non- automatic (passive) monitoring of NO<sub>2</sub> at 108 sites during 2021.**

presents the details of the sites.

Maps showing the location of the monitoring sites are provided in figures 7 - 15. Further details on Quality Assurance/Quality Control (QA/QC) and bias adjustment for the diffusion tubes are included in Appendix C.

Table 3 - Details of Automatic Monitoring Sites

Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Monitoring Technique	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Does this location represent worst-case exposure?
<b>Cardiff City Centre AURN</b>	Urban Background	318416	176525	NO <sub>2</sub>	N	Chemiluminescence	Y (5m)	200m	N
				PM <sub>10</sub> , PM <sub>2.5</sub>		TEOM- FDMS	Y (5m)	200m	N
				SO <sub>2</sub>		UV Fluorescence	Y (5m)	200m	N
				CO		Infra-Red GFC	Y (5m)	200m	N
				O <sub>3</sub>		UV Absorption	Y (5m)	200m	N
<b>Cardiff Newport Road AURN</b>	Roadside/ Urban Traffic	320095	177520	NO <sub>2</sub>	N	Chemiluminescence	Y (12m)	4.5m	N
				PM <sub>10</sub>		Beta Attenuation Monitor with Gravimetric Equivalence	Y (12m)	4.5m	N



Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Monitoring Technique	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Does this location represent worst-case exposure?
Cardiff Castle Street	Roadside/ Urban Traffic	318055,	176459	NO <sub>2</sub>	N	Chemiluminescence	Y(2m)	2m	Y
				PM <sub>10</sub> , PM <sub>2.5</sub>	N	Beta Attenuation Monitor with Gravimetric Equivalence	Y(2m)	2m	Y
Westgate Street AQMesh	Roadside/ Urban Traffic	317957	176389	NO <sub>2</sub>	Y	Electrochemical Sensor	Y (2m)	0.5m	N
				PM <sub>10</sub> , PM <sub>2.5</sub>					
Lower Cathedral Road AQMesh	Roadside/ Urban Traffic	317540	176437	NO <sub>2</sub>	N	Electrochemical Sensor	Y (0.5m)	1.5m	Y
				PM <sub>10</sub> , PM <sub>2.5</sub>					
Tudor Street AQMesh	Roadside/ Urban Traffic	317871	175929	NO <sub>2</sub>	N	Electrochemical Sensor	Y (2m)	1.5m	N
				PM <sub>10</sub> , PM <sub>2.5</sub>					
	Roadside/	317516	177854	NO <sub>2</sub>	N		Y (2m)	1.5m	N

Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Monitoring Technique	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Does this location represent worst-case exposure?
North Road AQMesh	Urban Traffic			PM <sub>10</sub> , PM <sub>2.5</sub>		Electrochemical Sensor			
Penarth Road AQMesh	Roadside/ Urban Traffic	317748	175292	NO <sub>2</sub>	N	Electrochemical Sensor	Y (2.5m)	1.5m	Y
	PM <sub>10</sub> , PM <sub>2.5</sub>								
Lansdowne Road AQMesh	Roadside/ Urban Traffic	315960	176345	NO <sub>2</sub>	N	Electrochemical Sensor	N (5m)	1.5m	N
	PM <sub>10</sub> , PM <sub>2.5</sub>								
Llandaff AQMA AQMesh	Roadside/ Urban Traffic	315198	178220	NO <sub>2</sub>	Y	Electrochemical Sensor	Y (0.5m)	1.5m	Y
	PM <sub>10</sub> , PM <sub>2.5</sub>								

**Notes:**

(1) 0m indicates that the sited monitor represents exposure and as such no distance calculation is required.

Figure 1 - Map of Automatic Monitoring Locations in Cardiff AQMA and Surrounding Areas

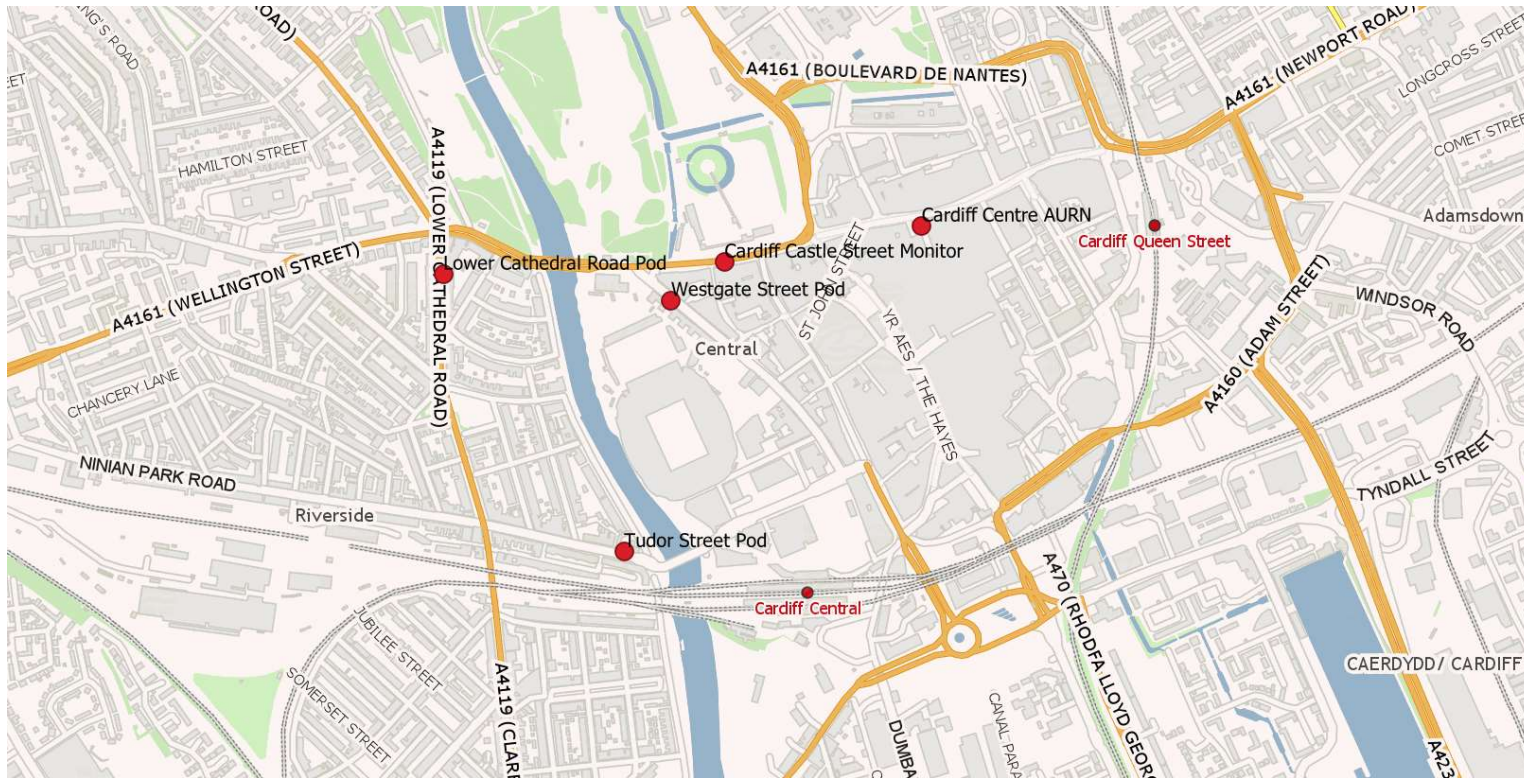


Figure 2 - Map of Automatic Monitoring Locations in Penarth Road and Tudor Street

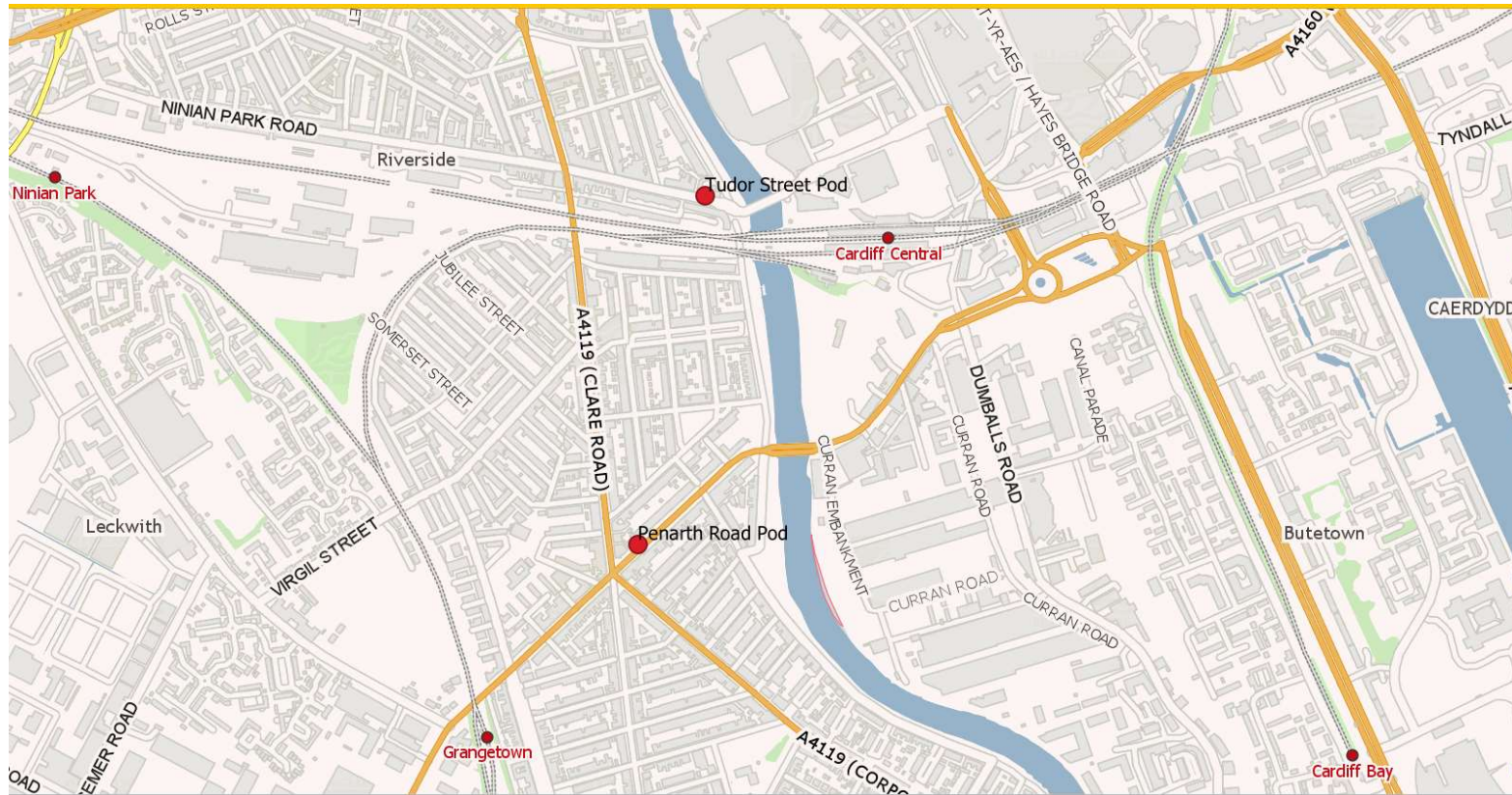


Figure 3 - Map of Automatic monitoring Location in North Road

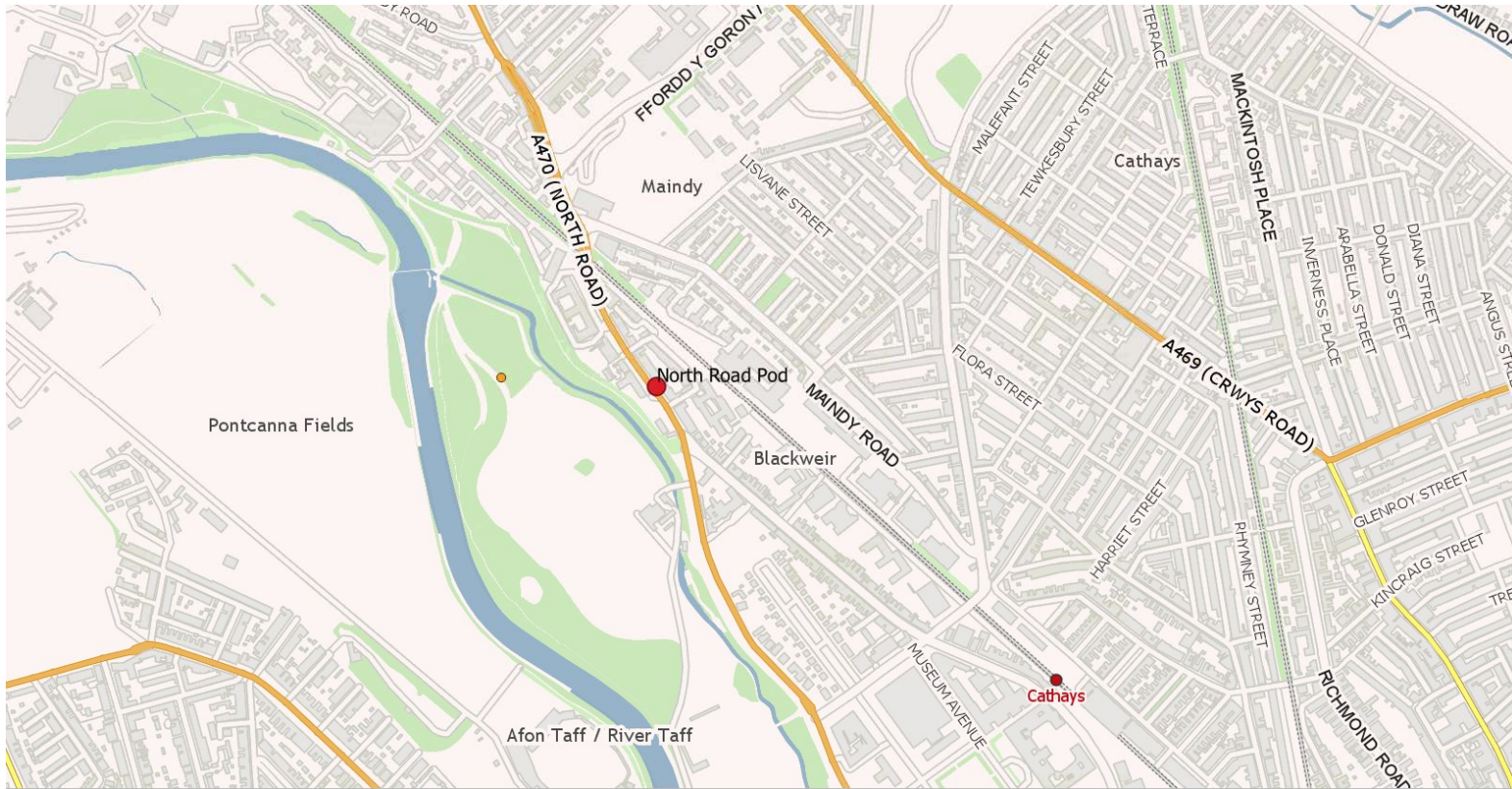


Figure 4 - Map of Automatic Monitoring Location in Newport Road

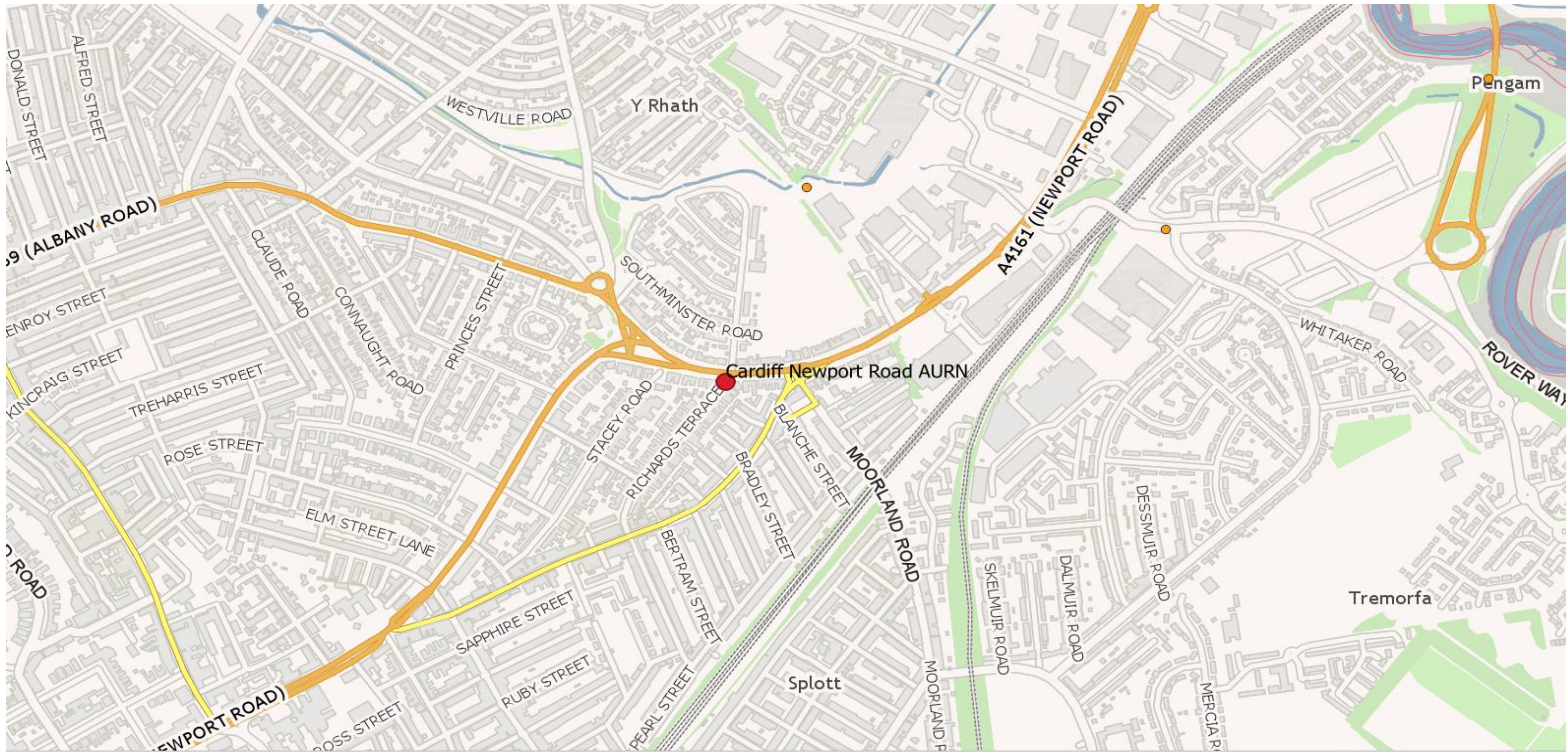


Figure 5 - Map of Automatic Monitoring Location in Llandaff AQMA



Figure 6 - Map of Automatic Monitoring Station near Lansdowne Road

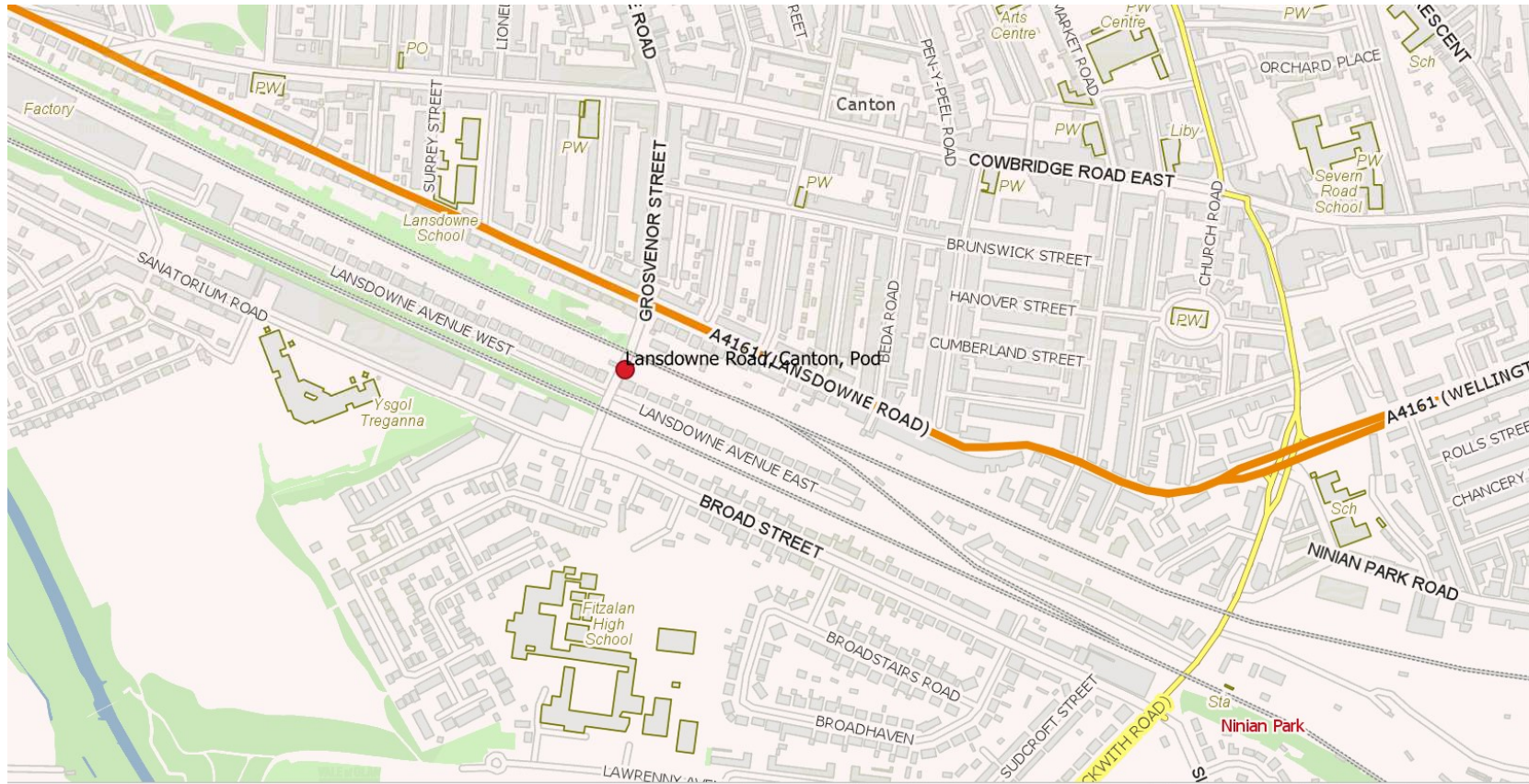




Table 4 - Details of Non-Automatic Monitoring Sites

Site ID	Site Name	Site Type	X OS Grid Reference	Y OS Grid Reference	Site Height (m)	Pollutants Monitored	In AQMA?	Is Monitoring Co-located with a Continuous Analyser (Y/N)	Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)	Distance to Kerb of Nearest Road (m) (N/A if not applicable)	Does this Location Represent Worst-Case Exposure?
16	Ninian Park Road	Roadside	317040	176060	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
58	Westgate Street	Kerbside	317937	176400	2.5	NO <sub>2</sub>	Y	N	N (5m)	0.5m	Y
81	Stephenson Court	Roadside	319387	176980	2	NO <sub>2</sub>	Y	N	Y (0.05m)	5m	Y
86	19 Fair oak Road	Roadside	318452	178805	1.5	NO <sub>2</sub>	N	N	Y 0.10m)	10m	Y
96	Manor Way Junction	Roadside	316601	179653	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
98	Western Avenue (premises)	Roadside	314805	177345	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10m	Y

99	Cardiff Road Llandaff	Roadside	315275	178117	1.5	NO <sub>2</sub>	Y	N	Y (0.05m)	3m	Y
101	Cardiff Centre AURN	Urban Centre	318416	176525	3	NO <sub>2</sub>	N	Y, Triplicate with Tubes 102 & 103	Y (0.10m)	200m	Y
102	Cardiff Centre AURN	Urban Centre	318416	176525	3	NO <sub>2</sub>	N	Y, Triplicate with Tubes 101 & 103	Y (0.10m)	200m	Y
103	Cardiff Centre AURN	Urban Centre	318416	176525	3	NO <sub>2</sub>	N	Y, Triplicate with Tubes 101 & 102	Y (0.10m)	200m	Y
106	30 Caerphilly Road	Roadside	316851	179520	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
112	17 Sloper Road	Roadside	316613	175910	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
115	21 Llandaff Road	Roadside	316604	176641	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
117	25 Cowbridge Road West	Roadside	314458	176735	2	NO <sub>2</sub>	Y	N	Y (0.05m)	2m	Y
126	Westgate Street Flats	Roadside	317946	176387	1.5	NO <sub>2</sub>	Y	N	Y (0.10m)	5m	Y
128	117 Tudor Street	Roadside	317540	175979	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
131	Dragon Court	Roadside	319292	176932	1.75	NO <sub>2</sub>	Y	N	Y (0.05m)	5m	Y

143	Windsor House	Roadside	318009	176337	1.5	NO <sub>2</sub>	Y	N	Y (0.10m)	6.5m	Y
144	Marlborough House	Roadside	318046	176307	1.5	NO <sub>2</sub>	Y	N	Y (0.10m)	6.5m	Y
147	211 Penarth Road	Roadside	317636	175161	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	7.0m	Y
148	161 Clare Road	Roadside	317695	175389	1.5	NO <sub>2</sub>	N	N	Y (0.05)	5.0m	Y
149	10 Corporation Road	Roadside	317764	175174	1.5	NO <sub>2</sub>	N	N	Y (0.05)	4.6m	Y
156	2a/4 Colum Road	Roadside	317997	177412	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	5.0m	Y
157	47 Birchgrove Road	Roadside	316605	179703	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	8.0m	Y
158	64/66 Cathays Terrace	Roadside	318093	177716	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3.0m	Y
159	IMO façade replacement	Roadside	320709	177918	1.5	NO <sub>2</sub>	N	N	Y (0.10m)	4.0m	Y
166	163 Lansdowne Road	Roadside	315950	176424	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5.4m	Y
168	570 Cowbridge Road East	Roadside	314856	176929	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4.8m	Y

174	76 North Road	Kerbside	317508	177868	1.5	NO <sub>2</sub>	N	N	Y (0.1m)	1m	Y
179	Altolusso, Bute Terrace	Roadside	318627	176039	2	NO <sub>2</sub>	N	N	N (5.1m)	2.1m	N
183	Station Terrace	Kerbside	318765	176623	2	NO <sub>2</sub>	N	N	N (5.5m)	0.5m	Y
184	Hopouse, St Mary Street	Roadside	318335	176074	2	NO <sub>2</sub>	Y	N	Y (0.05m)	3.0m	Y
186	Dempsey's Public House, Castle Street	Roadside	318044	176449	2	NO <sub>2</sub>	Y	N	Y (0.05m)	2.90m	Y
187	Angel Hotel	Roadside	317944	176436	2	NO <sub>2</sub>	Y	N	Y (0.05m)	2.85m	Y
188	Westgate Street (45 Apartments)	Roadside	318229	176154	1.8	NO <sub>2</sub>	Y	N	Y (0.05m)	3.30m	Y
190	3 Pearson Street	Kerbside	319056	177343	2	NO <sub>2</sub>	N	N	Y (0.05m)	0.75m	Y
191	7 Mackintosh Place	Roadside	318724	177776	2	NO <sub>2</sub>	N	N	Y (0.05m)	3.0m	Y
192	3 Cowbridge Road West	Roadside	314505	176769	2	NO <sub>2</sub>	Y	N	Y (0.05m)	3.0m	Y
194	115 Cowbridge Road West	Roadside	313870	176212	2	NO <sub>2</sub>	N	N	Y (0.05m)	12.5m	Y

195	244 Newport Road	Roadside	320147	177523	2	NO <sub>2</sub>	N	N	Y (0.05m)	6.0m	Y
196	2 Pencisely Road	Roadside	316223	177305	2	NO <sub>2</sub>	N	N	Y (0.05m)	6.5m	Y
198	Next Building to Stephenson Court	Roadside	319348	176958	2	NO <sub>2</sub>	Y	N	Y (0.05m)	4.6m	Y
199	157 Newport Road	Roadside	319599	177174	2	NO <sub>2</sub>	N	N	Y (0.05m)	12.6m	Y
200	350 Whitchurch Road	Roadside	317038	179073	2	NO <sub>2</sub>	N	N	Y (0.05m)	3.5m	Y
201	23 Lower Cathedral Road	Roadside	317547	176411	2	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
202	22 Clare Street	Roadside	317604	176053	2	NO <sub>2</sub>	N	N	Y (0.05m)	3.5m	Y
203	10 Fair oak Road	Roadside	318255	178533	2	NO <sub>2</sub>	N	N	Y (0.05m)	4.5m	Y
204	53 Neville Street	Roadside	317487	176303	2	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
207	42 Waungron Road	Roadside	314769	177343	2	NO <sub>2</sub>	N	N	Y (0.05m)	6.8m	Y
208	2 Llantrisant Road, Llandaff	Roadside	315152	178245	2	NO <sub>2</sub>	Y	N	Y (0.05m)	3m	Y

209	178 North Road	Roadside	317200	178537	2	NO <sub>2</sub>	N	N	Y (0.05m)	3.5m	Y
210	485 Caerphilly Road	Roadside	316692	181088	2	NO <sub>2</sub>	N	N	Y (0.05m)	7.5m	Y
211	19 Well Wood Close, Penylan	Roadside	320247	178903	2	NO <sub>2</sub>	N	N	Y (0.05m)	28m	Y
212	62 Bridge Road	Kerbside	315197	178221	2	NO <sub>2</sub>	Y	N	Y (0.05m)	1m	Y
214	Mitre Place, Llandaff	Roadside	315254	178153	2	NO <sub>2</sub>	Y	N	Y (0.05m)	3.5m	Y
218	16-18 Cowbridge Road West	Roadside	314471	176770	2	NO <sub>2</sub>	Y	N	Y (0.05m)	4.2m	Y
220	Fitzalan Court Newport Road	Kerbside	318955	176689	2	NO <sub>2</sub>	N	N	N (6.5m)	1m	N
221	Stuttgarter Strasse (New student flats)	Kerbside	318530	176823	2	NO <sub>2</sub>	N	N	N (8m)	1m	N
224	110 Cardiff Road	Roadside	315714	177738	2	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y
243	25 Cardiff Road, Llandaff	Kerbside	315712	177740	1.75	NO <sub>2</sub>	Y	N	N (4m)	1m	N
244	25 Bridge Road, Llandaff	Roadside	314910	178789	1.75	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y

245	47 Willows Ave	Urban Background	321006	176584	1.75	NO <sub>2</sub>	N	N	N/A	N/A	N
247	Radyr Primary school	Roadside	312857	180734	1.5						
249	Wentloog Road, Rumney	Roadside	321709	179081	1.75	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
250	Central Square Cardiff, City Centre	Roadside	318201	176022	1.75		N	N	N (4m)	2m	N
251	Heol Isaf, Radyr	Roadside	313244	180367	1.75	NO <sub>2</sub>	N	N	Y (0.05m)	5.2m	Y
254	Giraffe Nusery Cathedral Road	Roadside	317529	176340	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	2m	Y
255	Castle Street Co-Location 1	Kerbside	318075	176462	1.5	NO <sub>2</sub>	N	Y	Y (0.05m)	1.5m	Y
256	Castle Street Co-Location 2	Kerbside	318075	176462	1.5	NO <sub>2</sub>	N	Y	Y (0.05m)	1.5m	Y
257	Castle Street Co-Location 3	Kerbside	318075	176462	1.5	NO <sub>2</sub>	N	Y	Y (0.05m)	1.5m	Y
258	Lampost outside 116 Penarth Road	Kerbside	317760	175310	1.5	NO <sub>2</sub>	N	Y	Y (0.05m)	7m	Y
<b>Cardiff School Zone TRO Project</b>											

Site ID	Site Name	Site Type	X OS Grid Reference	Y OS Grid Reference	Site Height (m)	Pollutants Monitored	In AQMA?	Is Monitoring Co-located with a Continuous Analyser (Y/N)	Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)	Distance to Kerb of Nearest Road (m) (N/A if not applicable)	Does this Location Represent Worst-Case Exposure?
TRO-001	Whitchurch High Lower School	Kerbside	315621	180320	1.5	NO <sub>2</sub>	N	N	N (4m)	5m	N
TRO-002	Glan-Y-Nant Terrace (inside)	Roadside	315589	180316	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	2m	Y
TRO-003	Crossroads of Old Church Rd and Glan-Y-Nant terr (outside)	Kerbside	315548	180315	1.5	NO <sub>2</sub>	N	N	N (5m)	2m	N
TRO-004	Ysgol Melin Gruffydd School	Roadside	315620	180360	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	2m	Y
TRO-005	34 Glan-Y-Nant Rd (inside)	Roadside	315608	180151	1.5	NO <sub>2</sub>	N	N	Y (0.05)	3m	Y
TRO-006	36 Old Church Rd (outside)	Roadside	315497	180140	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	2m	Y
TRO-007	Peter Lea Primary	Roadside	313878	178319	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
TRO-008	36 Carter Place	Roadside	313894	178331	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y



<b>TRO-0099</b>	3 Carter Place	Roadside	314022	178334	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	5m	Y
<b>TRO-010</b>	Llandaff Church in Wales Primary	Kerbside	315274	177784	1.5	NO <sub>2</sub>	N	N	N (5m)	5m	N
<b>TRO-011</b>	20 Hendre Rd Llandaff	Kerbside	315279	177750	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y
<b>TRO-012</b>	48 Hendre Rd Llandaff	Roadside	315209	177668	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
<b>TRO-013</b>	Pencaeru School	Kerbside	312803	175519	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
<b>TRO-014</b>	16 Cyntwell Avenue	Roadside	312809	175496	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y
<b>TRO-015</b>	6A Cyntwell Avenue	Roadside	312734	175411	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
<b>TRO-016</b>	29 Norfolk St	Roadside	315811	176555	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
<b>TRO-017</b>	209 Llandowne Rd	Roadside	315801	176492	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y
<b>TRO-018</b>	Llandowne Primary School	Roadside	315801	176492	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y
<b>TRO-019</b>	St Cuthberts Primary School	Kerbside	319027	175493	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y

<b>TRO-020</b>	Letton Road	Kerbside	318910	175456	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-021</b>	58 Letton Road	Kerbside	318945	175546	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-022</b>	Tredegaville	Roadside	319268	176804	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	4m	Y
<b>TRO-023</b>	Newport Road School Lane Zone	Kerbside	319228	176777	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-024</b>	Glossops Road	Kerbside	319283	176827	1.5	NO <sub>2</sub>	N	N	N (5m)	1m	Y
<b>TRO-025</b>	St Peters Primary School	Roadside	319394	177096	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y
<b>TRO-026</b>	Southey Street	Kerbside	319339	177006	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-027</b>	Wordsworth Avenue	Kerbside	319327	177080	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-028</b>	St Monica's / Gladstone Primary School	Roadside	317982	178180	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	3m	Y
<b>TRO-029</b>	Pentyrch Street	Kerbside	317987	178156	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-030</b>	Cwmdare Street	Kerbside	317855	178921	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y

<b>TRO-031</b>	Lakeside Primary School	Roadside	319031	179949	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y
<b>TRO-032</b>	Ontario Way	Kerbside	319012	180050	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-033</b>	Woolaston Avenue	Kerbside	318898	180012	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-034</b>	Bryn Hafod Primary School	Roadside	321817	180406	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y
<b>TRO-035</b>	8 Blagdon Close	Kerbside	321847	180402	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-036</b>	Uphill Road	Kerbside	321834	180331	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-037</b>	Glan Y Afon Primary School	Roadside	321705	181427	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y
<b>TRO-038</b>	Browning Close	Kerbside	321738	181398	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-039</b>	Thackerey Crescent	Kerbside	321834	181282	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-040</b>	Willow Brook Primary School	Kerbside	324489	180953	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y
<b>TRO-041</b>	Bullrush Close	Kerbside	324519	180949	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y

<b>TRO-042</b>	Sandbrook Road	Kerbside	324529	180975	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-043</b>	Creigau Primary School	Kerbside	307904	181561	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	1m	Y
<b>TRO-044</b>	Tregarth Court	Kerbside	307896	181569	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>TRO-045</b>	TY-Nant Road	Kerbside	307967	181585	1.5	NO <sub>2</sub>	N	N	N (2m)	1m	Y
<b>Dusty Forge Community Centre Green Wall Project, Cowbridge Road West, Ely</b>											
<b>Site ID</b>	<b>Site Name</b>	<b>Site Type</b>	<b>X OS Grid Reference</b>	<b>Y OS Grid Reference</b>	<b>Site Height (m)</b>	<b>Pollutants Monitored</b>	<b>In AQMA?</b>	<b>Is Monitoring Co-located with a Continuous Analyser (Y/N)</b>	<b>Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)</b>	<b>Distance to Kerb of Nearest Road (m) (N/A if not applicable)</b>	<b>Does this Location Represent Worst-Case Exposure?</b>
<b>GW-01</b>	Dusty Forge Building Façade 1	Roadside	312870	175711	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10	Y
<b>GW-02</b>	Dusty Forge Building Façade 2	Roadside	312822	175719	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10	Y
<b>GW-03</b>	Dusty Forge Building Façade 3	Roadside	312860	175705	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10	Y
<b>GW-04</b>	Dusty Forge Kerbside 1	Kerbside	312896	175703	1.5	NO <sub>2</sub>	N	N	N	2	Y

<b>GW-05</b>	Dusty Forge Kerbside 2	Kerbside	312877	175705	1.5	NO <sub>2</sub>	N	N	N	1	Y
<b>GW-06</b>	Dusty Forge Kerbside 3	Kerbside	312884	175712	1.5	NO <sub>2</sub>	N	N	N	2	Y
<b>GW-07</b>	Cowbridge Rd West 456	Kerbside	312899	175731	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10	Y
<b>Kitchener Primary School, Kitchener Road</b>											
<b>Site ID</b>	<b>Site Name</b>	<b>Site Type</b>	<b>X OS Grid Reference</b>	<b>Y OS Grid Reference</b>	<b>Site Height (m)</b>	<b>Pollutants Monitored</b>	<b>In AQMA?</b>	<b>Is Monitoring Co-located with a Continuous Analyser (Y/N)</b>	<b>Relevant Exposure? (Y/N with distance (m) from monitoring site to relevant exposure)</b>	<b>Distance to Kerb of Nearest Road (m) (N/A if not applicable)</b>	<b>Does this Location Represent Worst-Case Exposure?</b>
<b>GW-08</b>	Kitchener Primary School Façade 1	Roadside	316735	176210	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10	Y
<b>GW-09</b>	Kitchener Primary Façade 2	Roadside	316743	176196	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10	Y
<b>GW-10</b>	Kitchener Primary Façade 3	Roadside	316754	176166	1.5	NO <sub>2</sub>	N	N	Y (0.05m)	10	Y
<b>GW-11</b>	Kitchener Road Lampost 1	Kerbside	316748	176176	1.5	NO <sub>2</sub>	N	N	N	2	Y
<b>GW-12</b>	Kitchener Road Lampost 2	Kerbside	316735	176211	1.5	NO <sub>2</sub>	N	N	N	1	Y

**Notes:**

(1) 0m indicates that the sited monitor represents exposure and as such no distance calculation is required.

Figure 7 - Map of Non-Automatic Monitoring Locations in Cardiff City Centre AQMA and Surrounding Areas

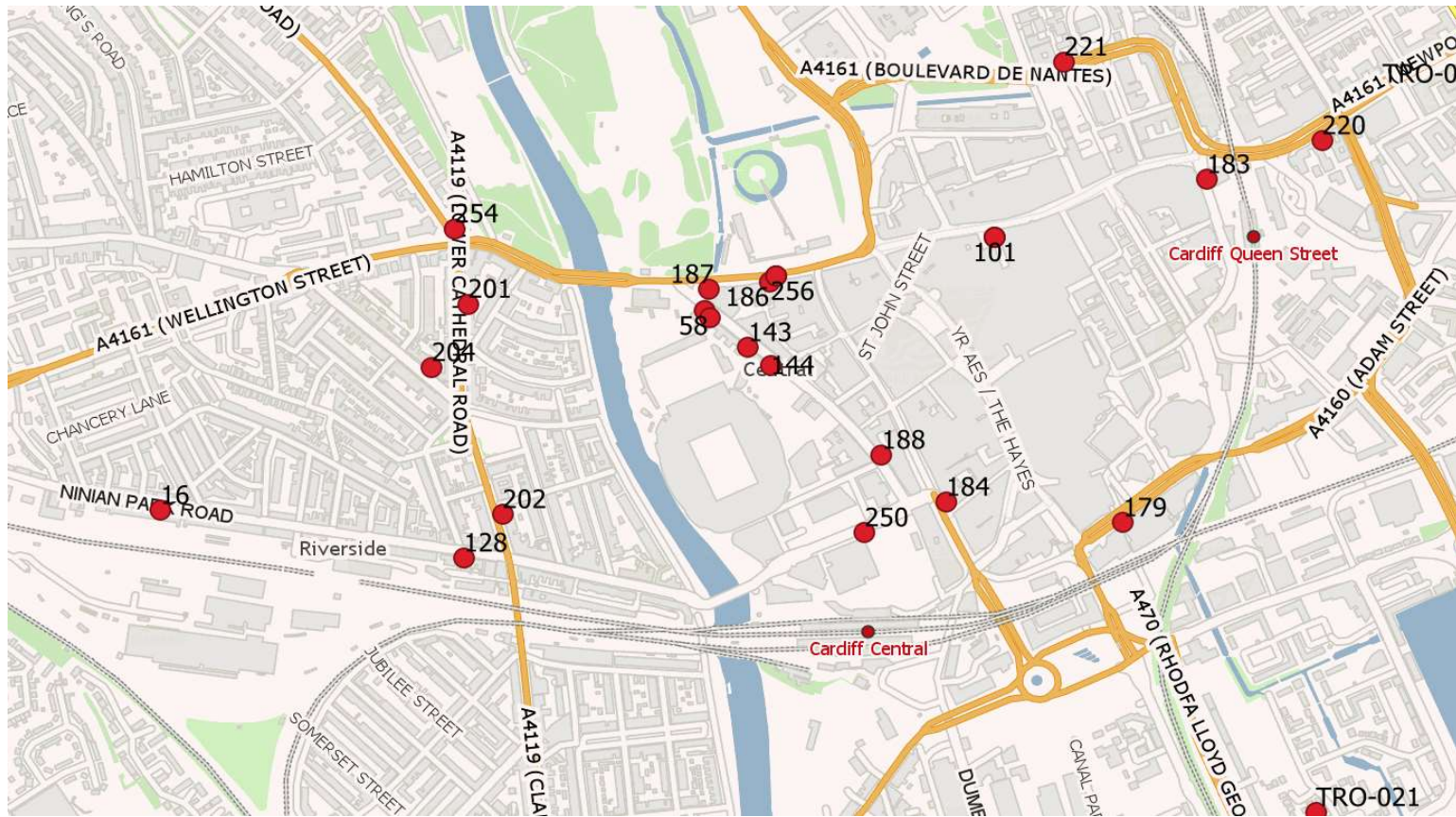


Figure 8 - Map of Non-Automatic Monitoring Locations in Stephenson Court AQMA and Surrounding Areas

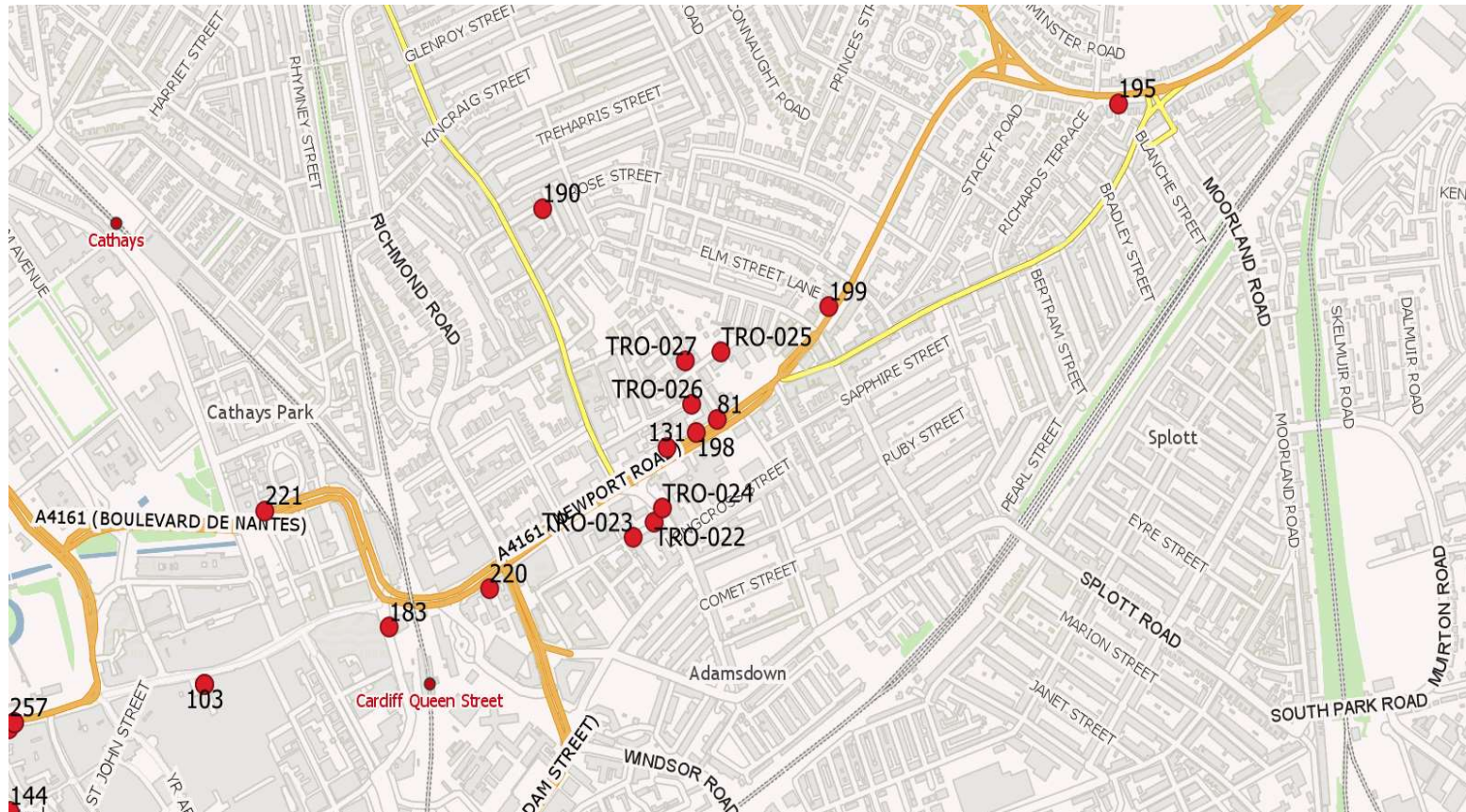




Figure 9 - Map of Non-Automatic Monitoring Locations in Llandaff AQMA and Surrounding Areas

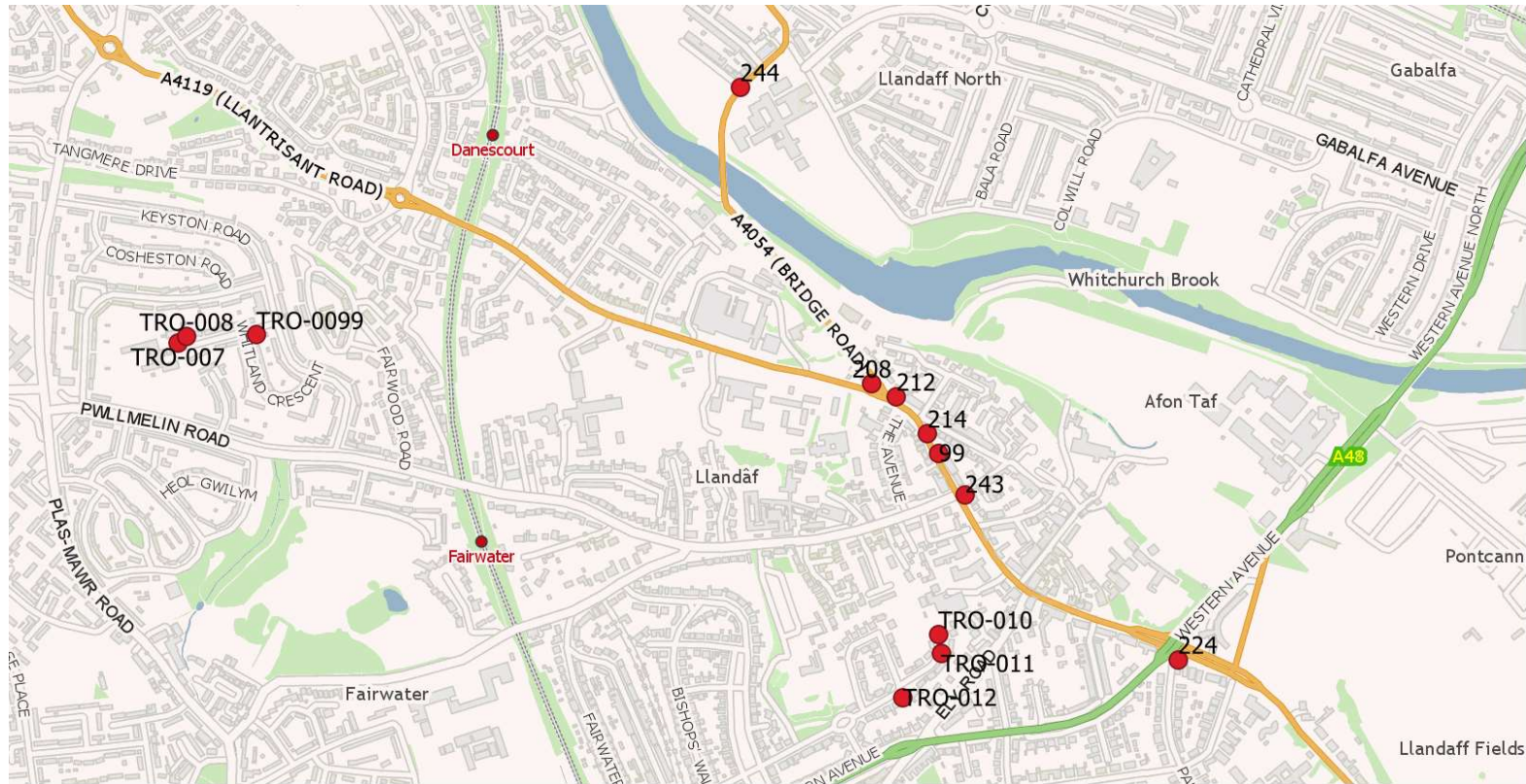


Figure 10 - Map of Non-Automatic Monitoring Locations In Ely Bridge AQMA and Surrounding Areas

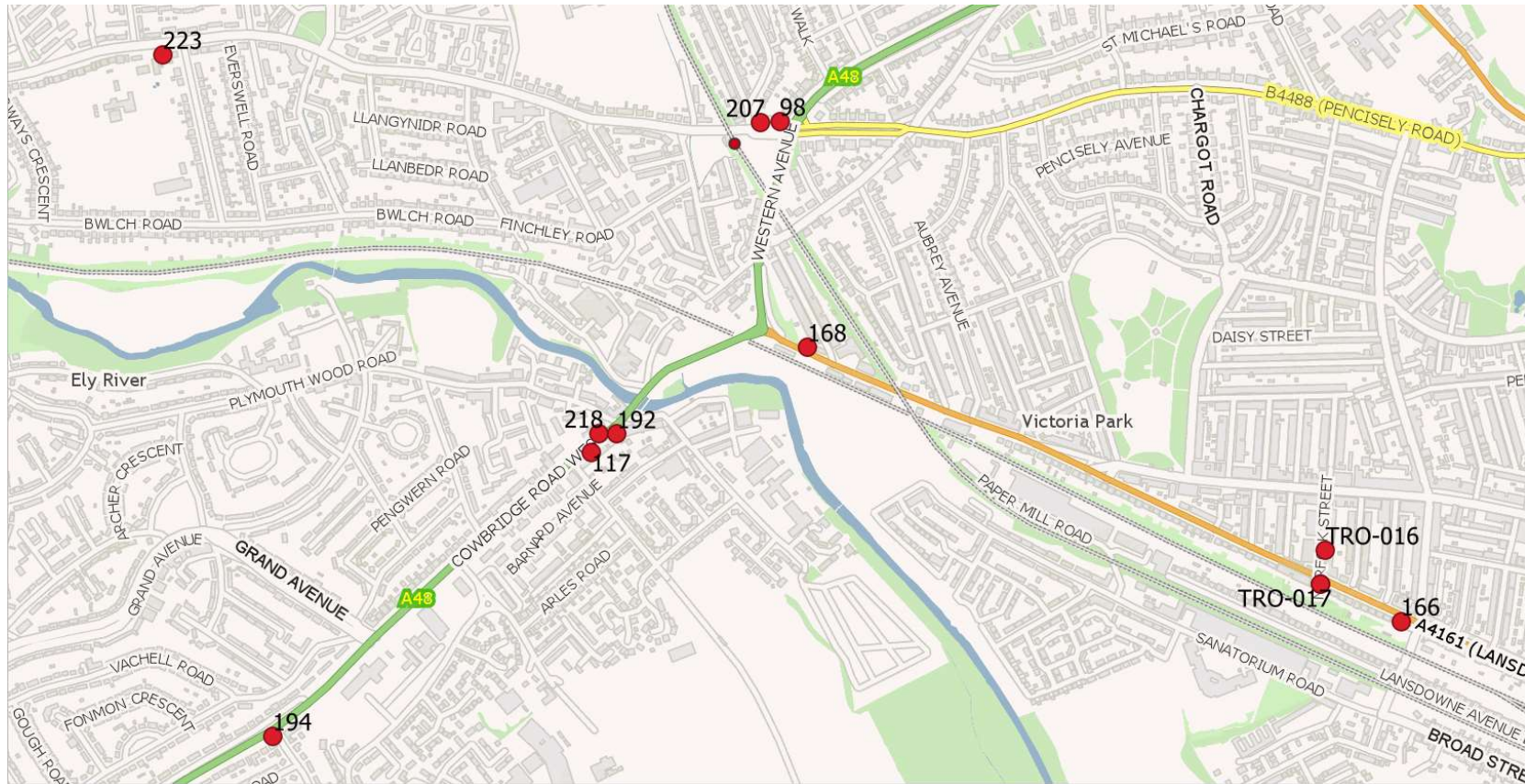


Figure 11 - Map of Non-Automatic Monitoring Locations in Cathays, Penylan and Surrounding Areas

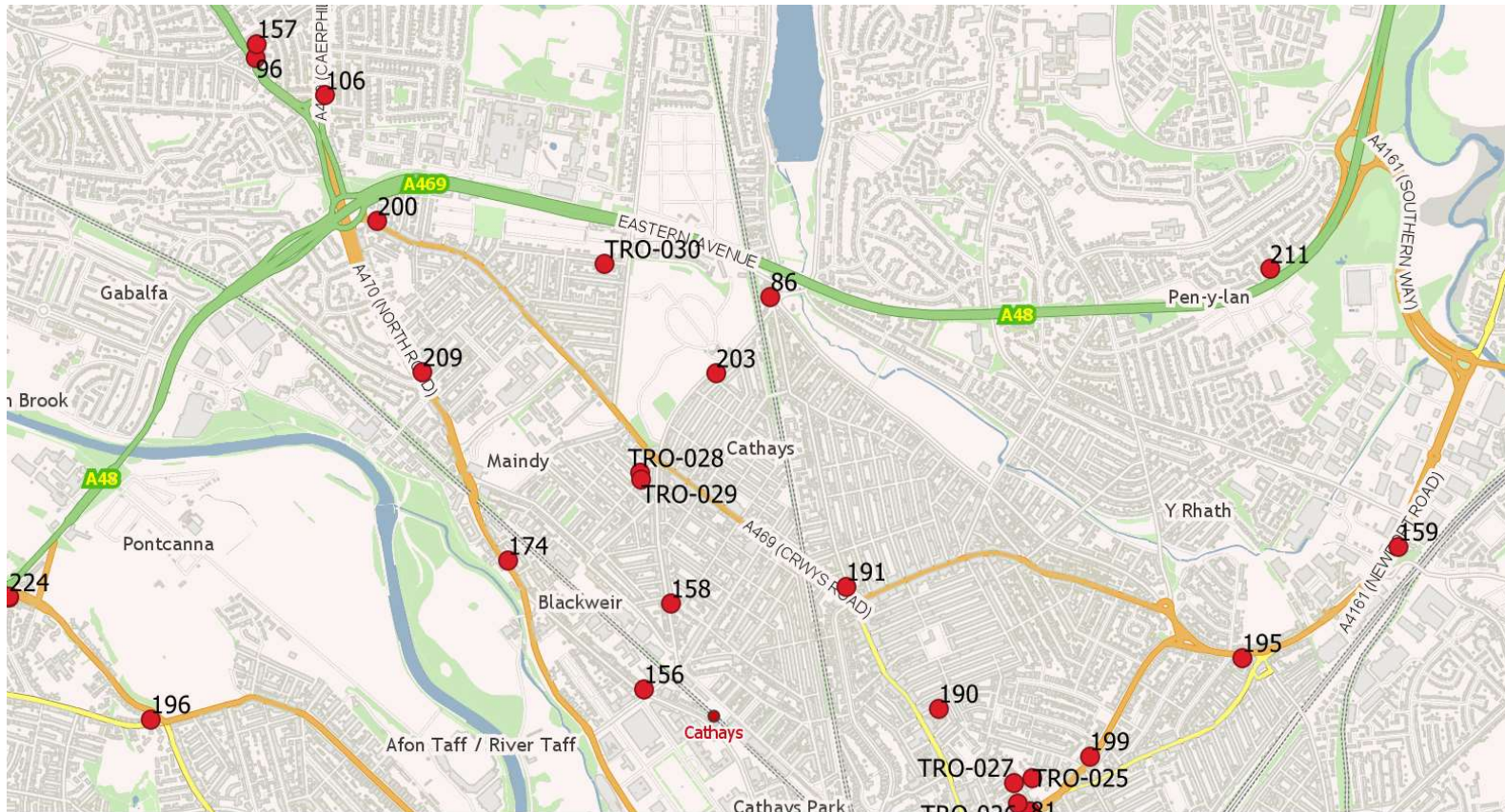


Figure 12 - Map of Monitoring Locations in Llanrumney, St Mellons and Surrounding Areas

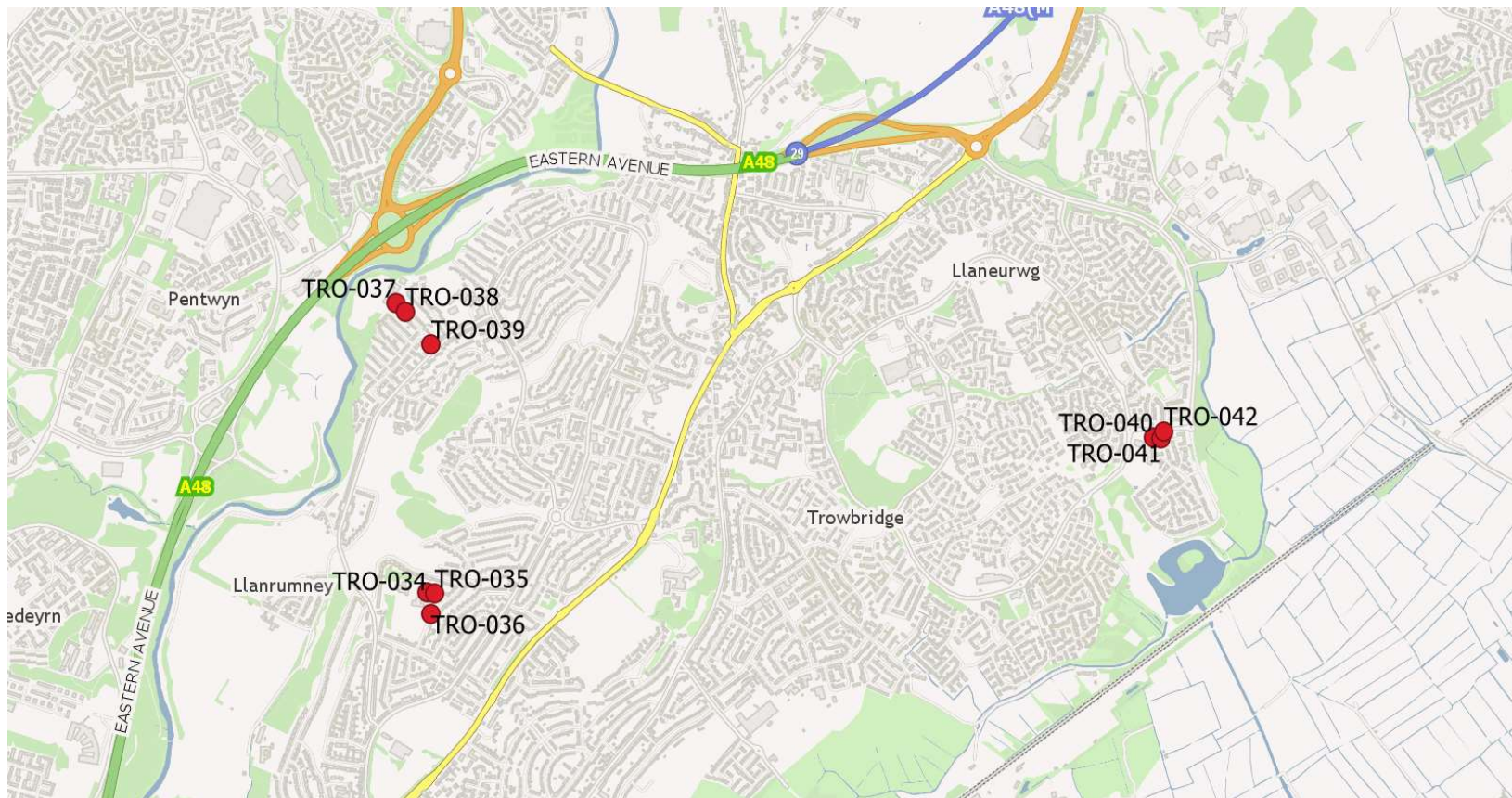


Figure 13 - Map of Non-Automatic Monitoring Locations in Riverside, Canton and Surrounding Areas

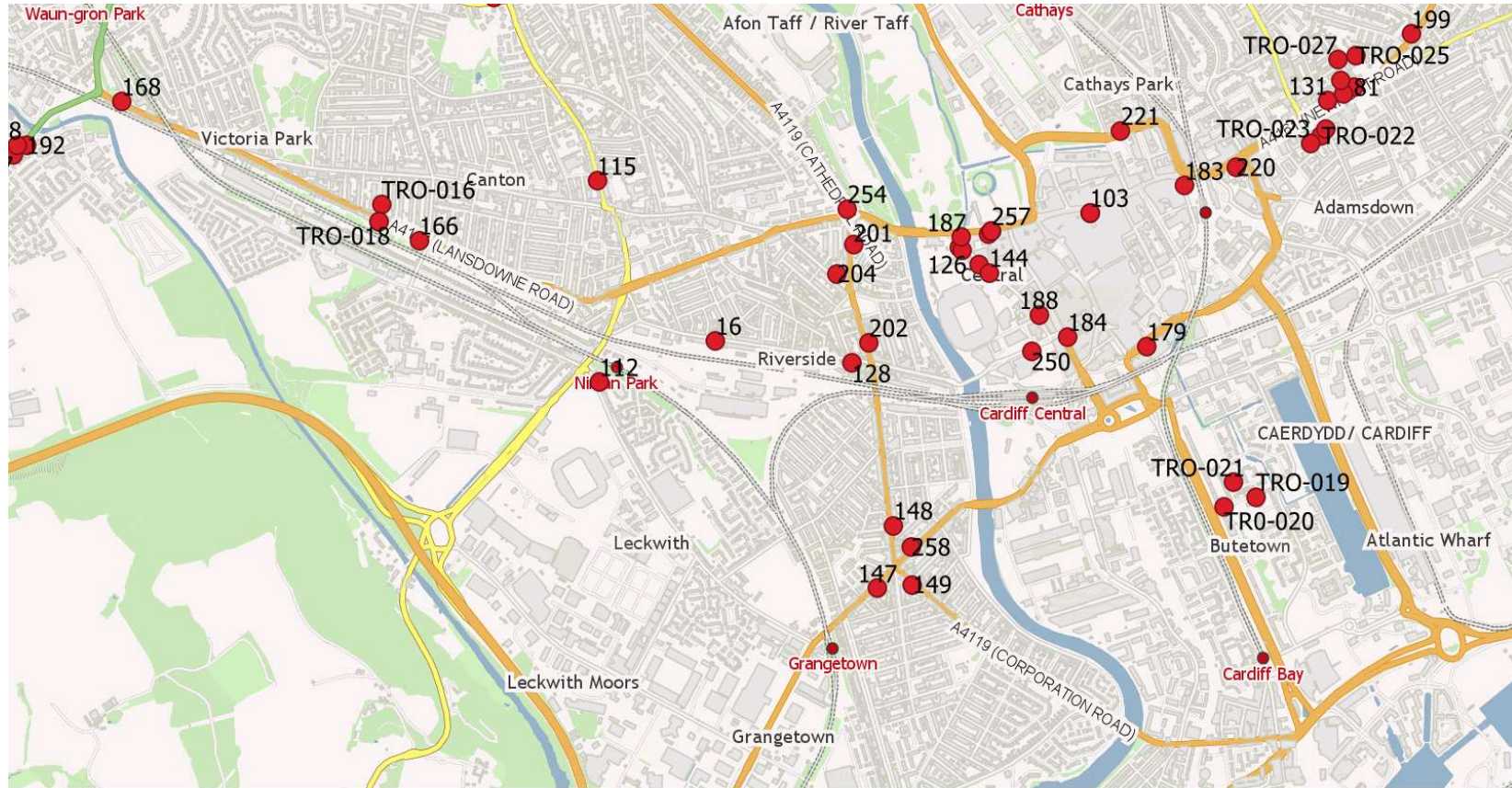


Figure 14 - Map of Non-Automatic Monitoring Locations in Cardiff North

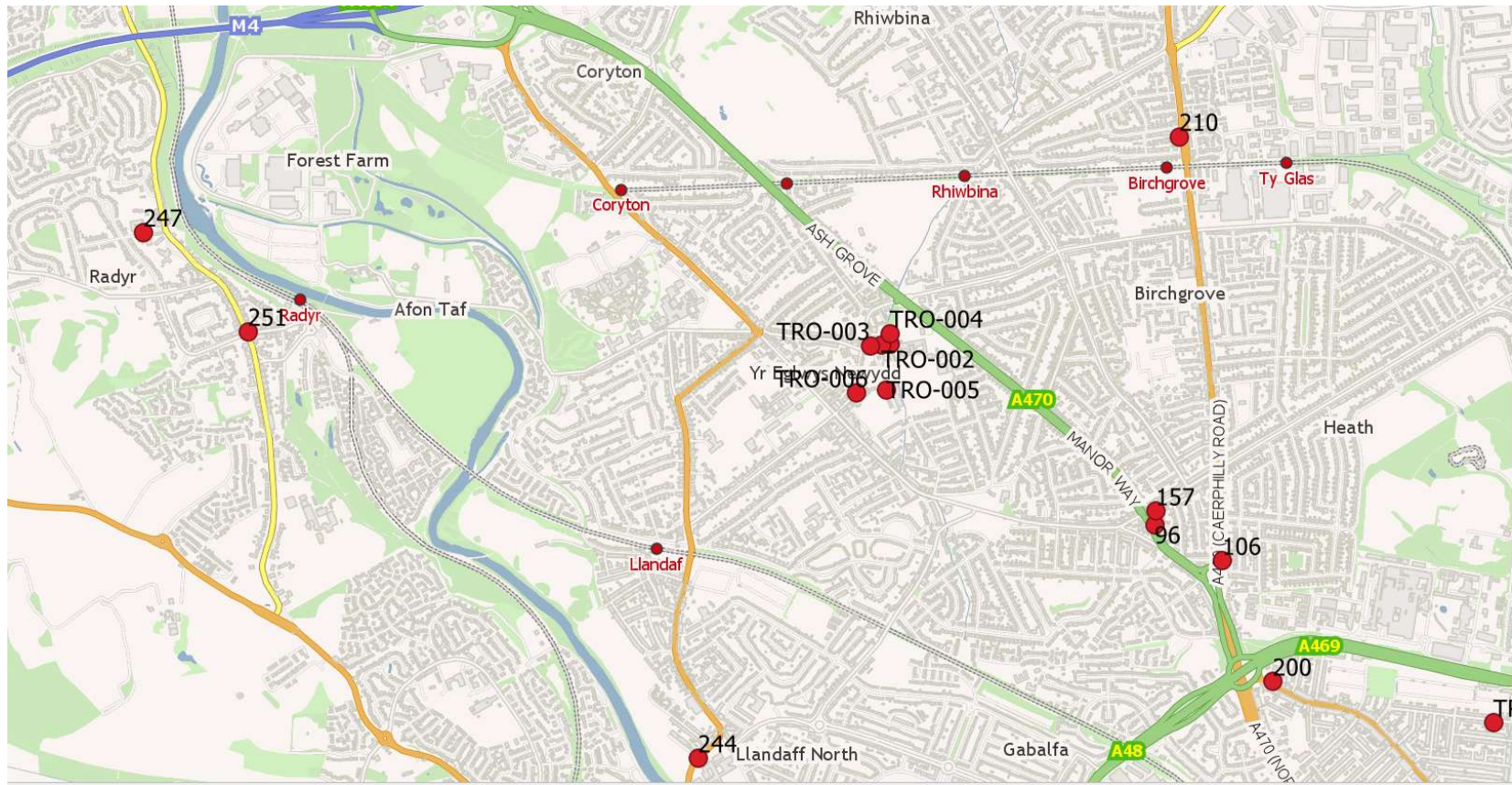
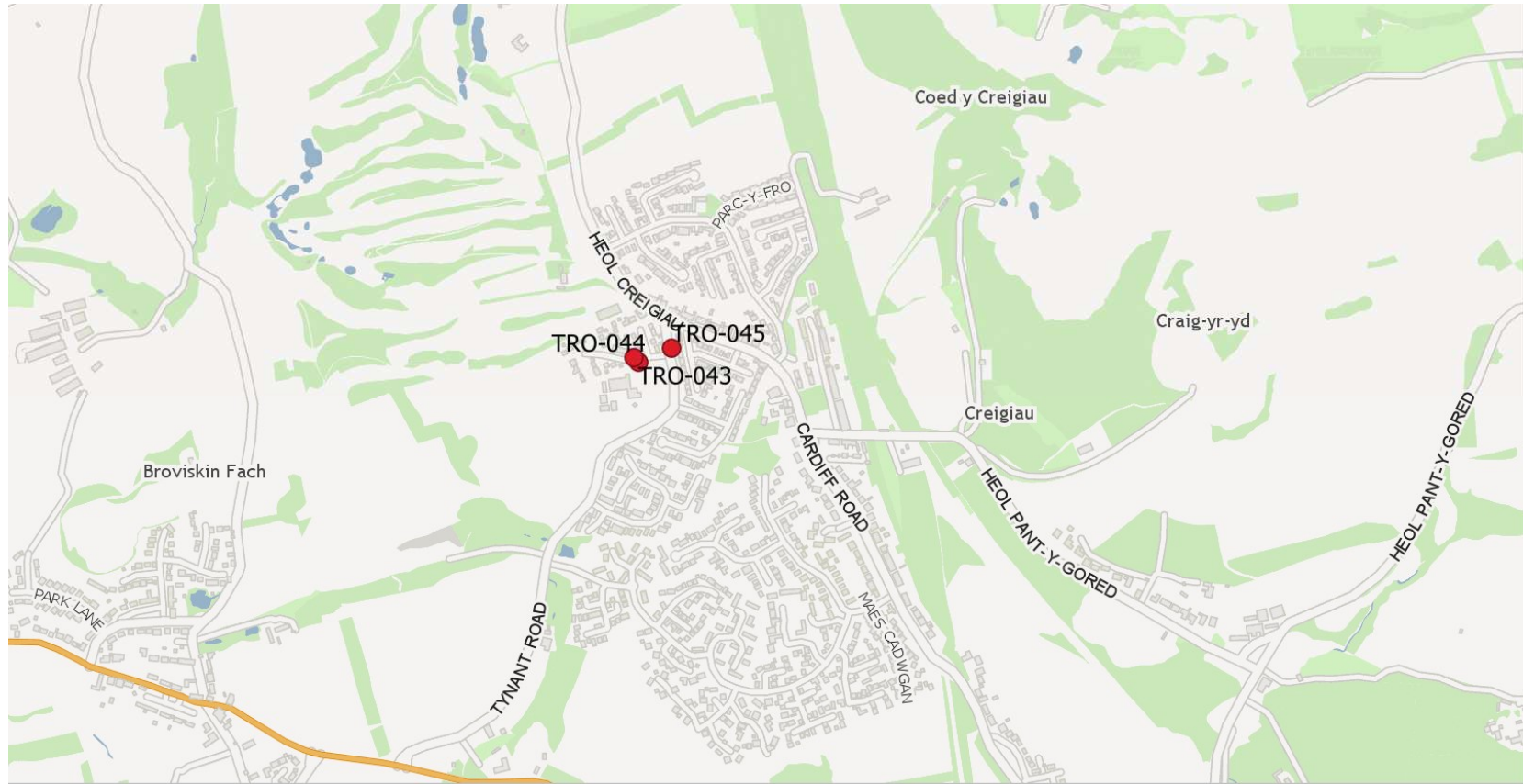


Figure 15 - Map of Non-Automatic Monitoring Locations in Creigiau



## 2.2 2021 Air Quality Monitoring Results

Table 5 – Non-Automatic Annual Mean NO<sub>2</sub> Monitoring Results (µg/m<sup>3</sup>)

Site ID	Site Type	Monitoring Type	Valid Data Capture 2021 (%) <sup>(1)</sup>	Within AQMA?	Annual mean concentration (adjusted for bias) µg/m <sup>3</sup> <sup>(2)</sup>						
					2015	2016	2017	2018	2019	2020	2021
					(Bias Adjustment Factor = 0.79)	(Bias Adjustment Factor = 0.78)	(Bias Adjustment Factor = 0.77)	(Bias Adjustment Factor = 0.76)	(Bias Adjustment Factor = 0.75)	(Bias Adjustment Factor = 0.76)	(Bias Adjustment Factor = 0.78)
16	Roadside	Diffusion Tube	100	N	27.9	28.9	28.9	27.8	27.3	23.6	23.2
58	Kerbside	Diffusion Tube	100	Y	48.3	45.3	44.5 <sup>2</sup>	45.8	41.2	30 <sup>2</sup>	30.8
81	Roadside	Diffusion Tube	100	Y	35.3	37.6	35.9	34.9	34.4	27.2	29.3
86	Roadside	Diffusion Tube	100	N	34.9	35.6	37	33.4	31.7	25.8	27.0
96	Roadside	Diffusion Tube	92	N	31.1	36.9	31.8	31.4	29.4	22.2	24.2
98	Roadside	Diffusion Tube	100	N	25.4	28.4	26.2	26.1	24.6	20	20.8
99	Roadside	Diffusion Tube	100	Y	29.8	34.8	31	31.7	30.4	22.8	25.1
101	Urban Centre	Diffusion Tube	50	N	20.3	23.1	21.3	21.1	NR	14.3 <sup>2</sup>	14.0
102	Urban Centre	Diffusion Tube	50	N	21.1	22.5	20.9	20.6	NR	14.7 <sup>2</sup>	13.4
103	Urban Centre	Diffusion Tube	50	N	20.7	23.2	21.6	20.7	NR	15.1 <sup>2</sup>	13.5
106	Roadside	Diffusion Tube	100	N	29.4	32.2	31.5	27.8	28.3	24.5	23.7



112	Roadside	Diffusion Tube	100	N	27.1	29.5	27.4	26.7	25.8	20.7	23.1
115	Roadside	Diffusion Tube	83	N	32.5	32.8	32.7	30	30.6	25.3	25.6
117	Roadside	Diffusion Tube	100	Y	39.5	41.3	38	40	36.8	30.7 <sup>2</sup>	36
126	Roadside	Diffusion Tube	92	Y	36	38.4	39.4 <sup>2</sup>	35.1	33.3	22.3	24
128	Roadside	Diffusion Tube	100	N	29.6	31.2	29.8	28.3	29.8	25	25
131	Roadside	Diffusion Tube	100	Y	39.5	39.6	41.7	38.2	35.7	28.8	26.7
143	Roadside	Diffusion Tube	100	Y	38.2	38.7	38.4 <sup>2</sup>	37.3	35.6	23.5	25.7
144	Roadside	Diffusion Tube	75	Y	37.2	38.3	36.8 <sup>2</sup>	34.3	33.9	25	26.4
147	Roadside	Diffusion Tube	100	N	27.7	28.8	26.2	29.3	26.9	20.5	23.8
148	Roadside	Diffusion Tube	100	N	27.5	29.2	27.3	26.6	25.6	21.3	23.9
149	Roadside	Diffusion Tube	100	N	33.6	31.2	32.5	31.3	30.1	26.8	25.9
156	Roadside	Diffusion Tube	92	N	25.9	29.7	25.7	26.8	24.8	17.4	20.1
157	Roadside	Diffusion Tube	100	N	27.2	28.2	28.3	25.1	23.6	19.3	19.4
158	Roadside	Diffusion Tube	100	N	25.5	29	26.1	26.2	24.2	17.6	21.0
159	Roadside	Diffusion Tube	100	N	34	35.5	38.6	35.6	32.2	26.4	27.4
166	Roadside	Diffusion Tube	100	N	32.1	33.2	32.1	30.6	31.4	26.3	26.7
168	Roadside	Diffusion Tube	100	N	24.3	27.7	26.2	26	24.7	21.1	22.7

174	Kerbside	Diffusion Tube	100	N	28.7	33.3	27.5	28.2	26.8	17.7	20.0
179	Roadside	Diffusion Tube	100	N	-	39.7 <sup>2</sup>	45.4 <sup>2</sup>	43. <sup>2</sup>	33.1 <sup>2</sup>	32.4	37.6
183	Kerbside	Diffusion Tube	100	N	-	35.9	31.2	31.1	30.9	23.5 <sup>2</sup>	23.7
184	Roadside	Diffusion Tube	67	Y	-	41.4	38.7 <sup>2</sup>	39.9	40.5 <sup>2</sup>	28.3 <sup>2</sup>	27.5 <sup>2</sup>
186	Roadside	Diffusion Tube	58	Y	-	47.5	47.7 <sup>2</sup>	45.8	42.7	23.1	24.5 <sup>2</sup>
187	Roadside	Diffusion Tube	92	Y	-	50.7	50.2 <sup>2</sup>	50.8	43.9 <sup>2</sup>	25.7 <sup>2</sup>	26.1
188	Roadside	Diffusion Tube	42	Y	-	49.8 <sup>2</sup>	49.8 <sup>2</sup>	52.4 <sup>2</sup>	43.7 <sup>2</sup>	32.5 <sup>2</sup>	26.8 <sup>2</sup>
190	Kerbside	Diffusion Tube	100	N	-	-	-	23.2	23.4	20.7	20.1
191	Roadside	Diffusion Tube	100	N	-	-	-	29.7	27.9	22.5	24.3
192	Roadside	Diffusion Tube	92	Y	-	-	-	39.7	38.6	30.8	31.7
194	Roadside	Diffusion Tube	100	N	-	-	-	22	20.4	15.8 <sup>2</sup>	18.4
195	Roadside	Diffusion Tube	100	N	-	-	-	31.6	31.2	24.2 <sup>2</sup>	24.6
196	Roadside	Diffusion Tube	100	N	-	-	-	24.9	25.2	19.4	22.0
198	Roadside	Diffusion Tube	100	Y	-	-	-	35.1	33.5	25.7	28.7
199	Roadside	Diffusion Tube	100	N	-	-	-	23.9	25	20.7	20.1
200	Roadside	Diffusion Tube	100	N	-	-	-	33.4	31.1	27.4 <sup>2</sup>	27.4
201	Roadside	Diffusion Tube	83	N	-	-	-	30.3	28.9	22.1	24.0

202	Roadside	Diffusion Tube	100	N	-	-	-	27.8	27.6	23.3	24.5
203	Roadside	Diffusion Tube	100	N	-	-	-	21.6	20.6	17.2	17.1
204	Roadside	Diffusion Tube	92	N	-	-	-	23.3	22.1	18.7	20.1
207	Roadside	Diffusion Tube	100	N	-	-	-	21.7	20.6	16.7	18.3
208	Roadside	Diffusion Tube	100	N	-	-	-	25.4	24.9	18.9	20.5
209	Roadside	Diffusion Tube	100	N	-	-	-	22.7	22.3	15.2 <sup>2</sup>	16.6
210	Roadside	Diffusion Tube	100	N	-	-	-	21.7	20.4	16.6	17.5
211	Roadside	Diffusion Tube	92	N	-	-	-	21.7	21.8	18.1	19.7
212	Kerbside	Diffusion Tube	92	Y	-	-	-	47.1 <sup>2</sup>	41.3	33.4	37.4
214	Roadside	Diffusion Tube	100	Y	-	-	-	-	32.3	24.8	25.4
218	Roadside	Diffusion Tube	100	Y	-	-	-	-	35.5	28.2	31.6
220	Kerbside	Diffusion Tube	67	N	-	-	-	-	38.4 <sup>2</sup>	27.9 <sup>2</sup>	30.4 <sup>2</sup>
221	Kerbside	Diffusion Tube	50	N	-	-	-	-	NA	30.4 <sup>2</sup>	26.9 <sup>2</sup>
224	Roadside	Diffusion Tube	92	N	-	-	-	-	23.1 <sup>2</sup>	18.5 <sup>2</sup>	18.8
243	Roadside	Diffusion Tube	100	N	-	-	-	-	-	25.7 <sup>2</sup>	28.2
244	Roadside	Diffusion Tube	92	N	-	-	-	-	-	18.2	18.0
245	Roadside	Diffusion Tube	100	N	-	-	-	-	-	14.3	15.0

247	Roadside	Diffusion Tube	83	N	-	-	-	-	-	-	11.4
249	Roadside	Diffusion Tube	100	N	-	-	-	-	-	17.3	16.5
250	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	26.7 <sup>2</sup>	28.4
251	Roadside	Diffusion Tube	100	N	-	-	-	-	-	13.5	14.9
254	Roadside	Diffusion Tube	92	N	-	-	-	-	-	-	27.7
255	Kerbside	Diffusion Tube	100	Y	-	-	-	-	-	-	25.8
256	Kerbside	Diffusion Tube	92	Y	-	-	-	-	-	-	25.3
257	Kerbside	Diffusion Tube	100	Y	-	-	-	-	-	-	26.2
258	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	29.4
TRO-001	Roadside	Diffusion Tube	58	N	-	-	-	-	-	10.9 <sup>2</sup>	11.9
TRO-002	Roadside	Diffusion Tube	100	N	-	-	-	-	-	12.9 <sup>2</sup>	13.4
TRO-003	Kerbside	Diffusion Tube	92	N	-	-	-	-	-	15.6	16.0
TRO-004	Roadside	Diffusion Tube	83	N	-	-	-	-	-	9.8 <sup>2</sup>	11.9
TRO-005	Roadside	Diffusion Tube	100	N	-	-	-	-	-	11.5	11.6
TRO-006	Roadside	Diffusion Tube	92	N	-	-	-	-	-	17.0 <sup>2</sup>	17.0
TRO-007	Roadside	Diffusion Tube	92	N	-	-	-	-	-	9.4	10.4
TRO-008	Roadside	Diffusion Tube	100	N	-	-	-	-	-	8.4	8.6

TRO-009	Roadside	Diffusion Tube	100	N	-	-	-	-	-	9.3	9.2
TRO-010	Kerbside	Diffusion Tube	83	N	-	-	-	-	-	10.5 <sup>2</sup>	10.6
TRO-011	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	12.2	10.9
TRO-012	Roadside	Diffusion Tube	100	N	-	-	-	-	-	10.6	10.4
TRO-013	Kerbside	Diffusion Tube	92	N	-	-	-	-	-	9.9 <sup>2</sup>	9.0
TRO-014	Roadside	Diffusion Tube	58	N	-	-	-	-	-	14.1	13.7
TRO-015	Roadside	Diffusion Tube	100	N	-	-	-	-	-	11.5	11.8
TRO-016	Roadside	Diffusion Tube	100	N	-	-	-	-	-	16.9	15.9
TRO-017	Roadside	Diffusion Tube	100	N	-	-	-	-	-	21.1	16.1
TRO-018	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	23.3
TRO-019	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	14.5
TRO-020	Kerbside	Diffusion Tube	67	N	-	-	-	-	-	-	14.7
TRO-021	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	17.2
TRO-022	Roadside	Diffusion Tube	92	N	-	-	-	-	-	-	19.3
TRO-023	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	19.5
TRO-024	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	29.6
TRO-025	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	15.3

TRO-026	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	14.8
TRO-027	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	16.4
TRO-028	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	13.4
TRO-029	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	14.4
TRO-030	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	13.8
TRO-031	Roadside	Diffusion Tube	92	N	-	-	-	-	-	-	10.5
TRO-032	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	10.0
TRO-033	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	11.1
TRO-034	Roadside	Diffusion Tube	92	N	-	-	-	-	-	-	10.3
TRO-035	Kerbside	Diffusion Tube	92	N	-	-	-	-	-	-	11.1
TRO-036	Kerbside	Diffusion Tube	67	N	-	-	-	-	-	-	11.3
TRO-037	Roadside	Diffusion Tube	25	N	-	-	-	-	-	-	4.1
TRO-038	Kerbside	Diffusion Tube	92	N	-	-	-	-	-	-	11.8
TRO-039	Kerbside	Diffusion Tube	83	N	-	-	-	-	-	-	13.4
TRO-040	Kerbside	Diffusion Tube	75	N	-	-	-	-	-	-	13.2
TRO-041	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	11.5
TRO-042	Kerbside	Diffusion Tube	83	N	-	-	-	-	-	-	13.4

TRO-043	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	7.9
TRO-044	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	8.0
TRO-045	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	10.7
GW-001	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	12.9
GW-002	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	11.8
GW-003	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	11.7
GW-004	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	22.4
GW-005	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	17.8
GW-006	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	19.6
GW-007	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	10.0
GW-008	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	17.9
GW-009	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	18.4
GW-010	Roadside	Diffusion Tube	100	N	-	-	-	-	-	-	19.0
GW-011	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	22.5
GW-012	Kerbside	Diffusion Tube	100	N	-	-	-	-	-	-	23.5

**Notes:**

Exceedances of the NO<sub>2</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in **bold**.

NO<sub>2</sub> annual means exceeding 60µg/m<sup>3</sup>, indicating a potential exceedance of the NO<sub>2</sub> 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

**Table 6 - Automatic Annual Mean NO<sub>2</sub> Monitoring Results (µg/m<sup>3</sup>)**

Site Name	Site Type	Within AQMA?	Valid Data Capture 2021 %	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2017	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2018	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2019	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2020	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2021
City Centre AURN	Urban Background	N	93	20	18	12	16	16
Newport Road AURN	Roadside	N	99	-	-	29	19	22
Cardiff Castle Street	Roadside	Y	100	-	-	-	-	25

**Notes:**

Exceedances of the NO<sub>2</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in **bold**.



NO<sub>2</sub> annual means exceeding 60µg/m<sup>3</sup>, indicating a potential exceedance of the NO<sub>2</sub> 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

**Table 7 - AQMesh Indicative Annual Mean NO<sub>2</sub> Monitoring Results**

<b>AQMesh Site Name</b>	<b>Valid Data Capture 2021 %</b>	<b>NO<sub>2</sub> Annual Mean Concentration (µg/m<sup>3</sup>) 2021</b>
Westgate Street	0	N/A
Lower Cathedral Road	100	19.9
Tudor Street	100	20
North Road	100	22.1
Penarth Road	100	12.7
Lansdowne Road, Canton	54	25.6
Llandaff AQMA	11	12

**Notes:**

AQMesh automatic monitors provide indicative data

Figure 16 – Trends in Non-Automatic Annual Mean NO<sub>2</sub> Concentrations in Cardiff City Centre AQMA

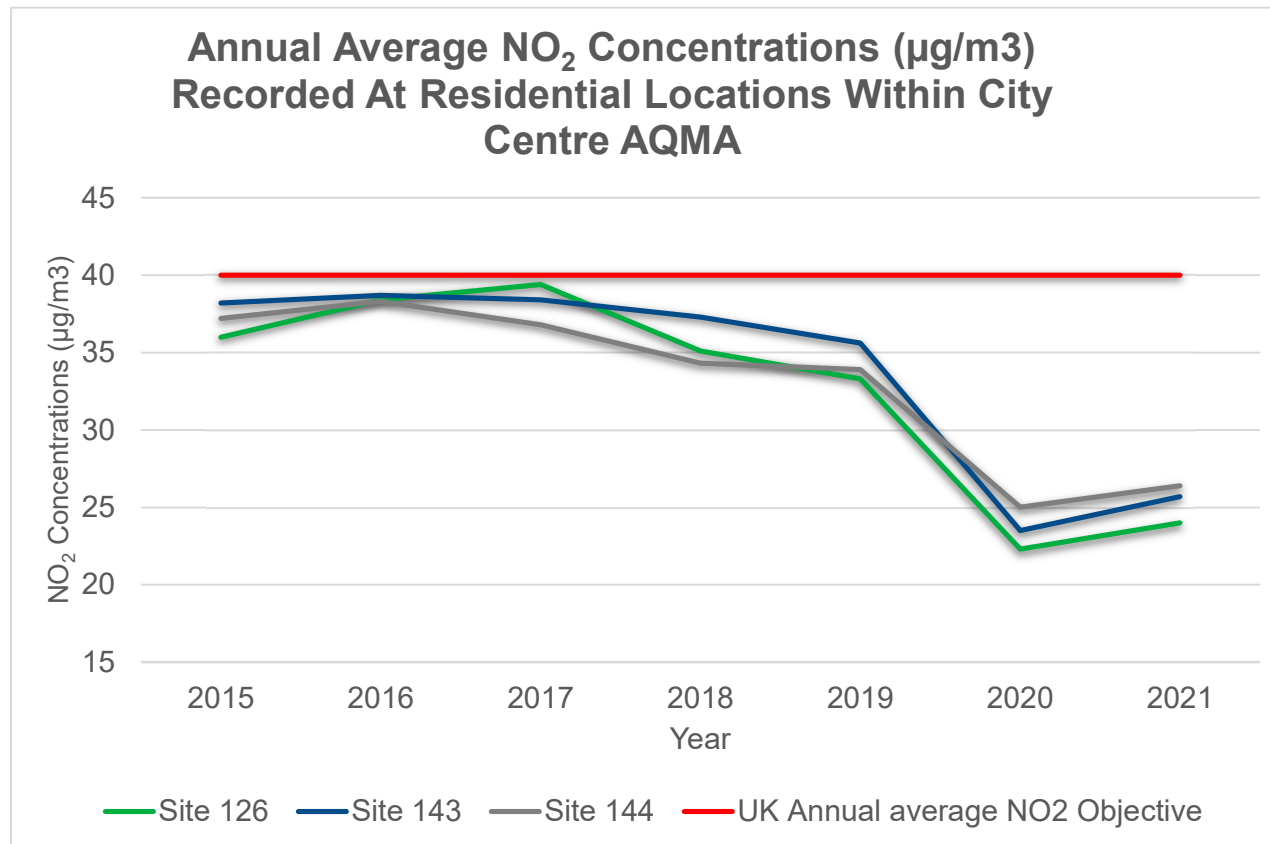


Figure 16 shows compliance with the Annual Air Quality Objective for NO<sub>2</sub> in 2021 within the Cardiff City Centre AQMA. An increase of up to 8% in NO<sub>2</sub> concentrations compared to 2020 was experienced at residential locations. In 2021 a reduction of 27% in NO<sub>2</sub> concentrations is seen, compared to pre-Covid 2019.

Figure 17 – Trends in Non-Automatic Annual Mean NO<sub>2</sub> Concentrations at Kerbside Locations Within Cardiff City Centre AQMA

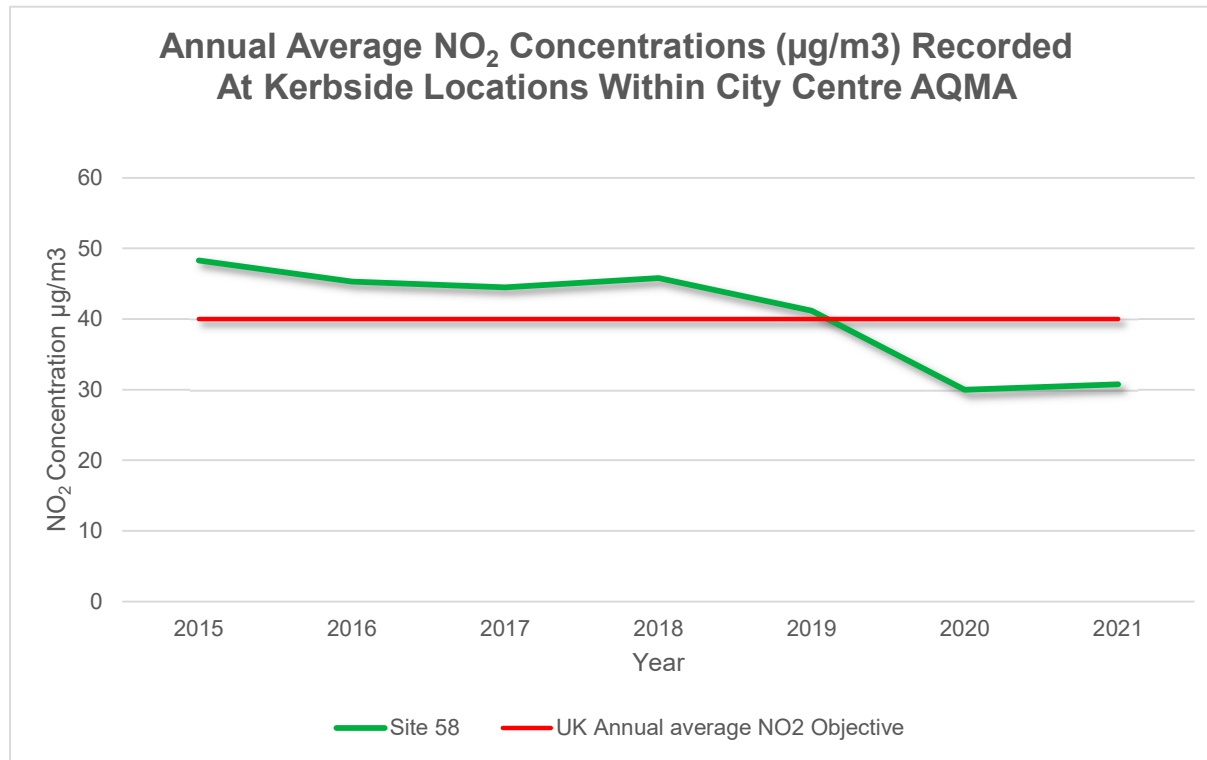


Figure 16 displays compliance in 2021 with the Annual Air Quality Objective for NO<sub>2</sub> within the Cardiff City Centre AQMA kerbside locations.

Figure 18 - Trends in Non-Automatic Annual Mean NO<sub>2</sub> Concentrations Ely Bridge AQMA

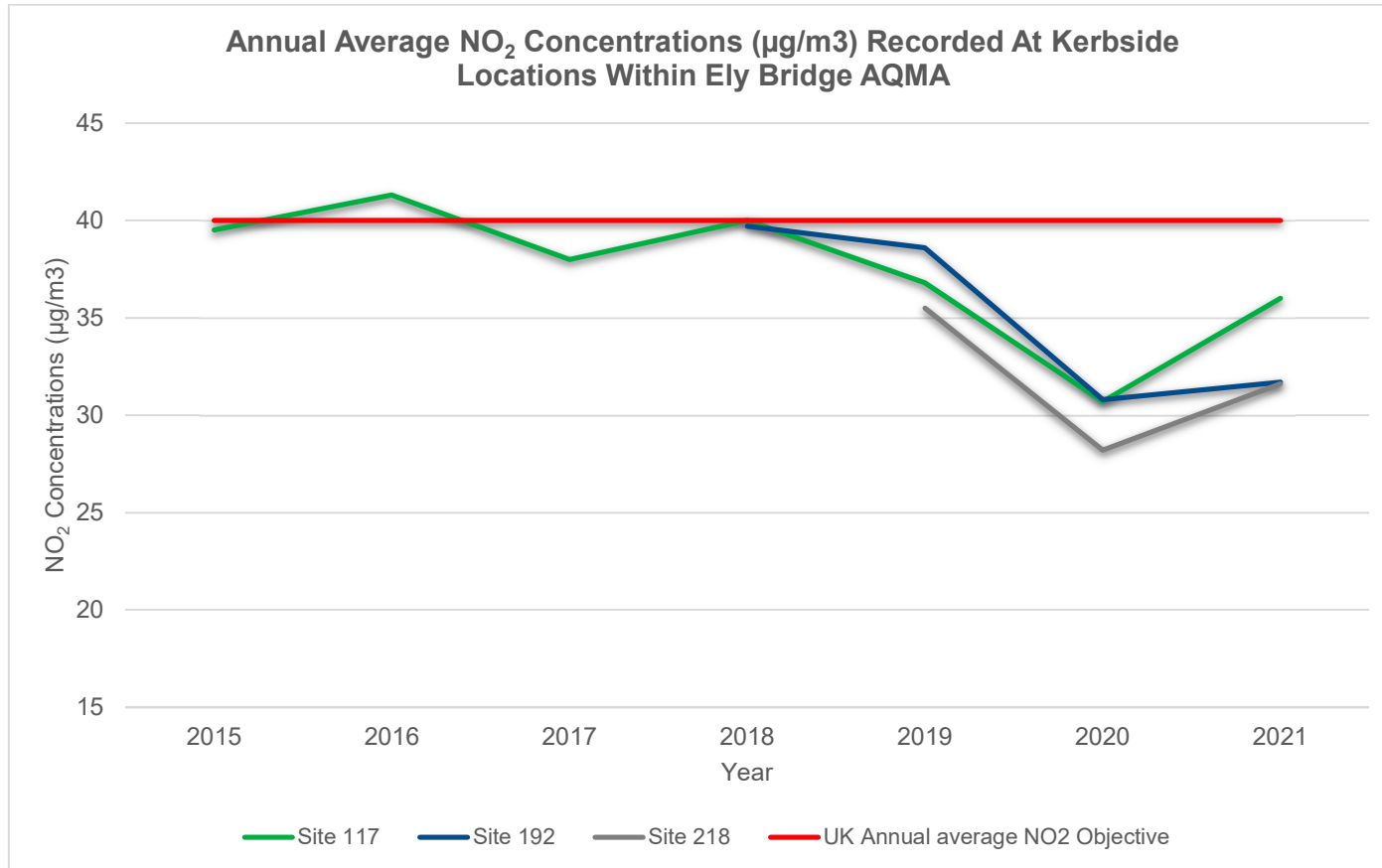


Figure 18 displays compliance with the Annual Air Quality Objective for NO<sub>2</sub> in 2021 within the Ely Bridge AQMA. An increase of up to 14% in NO<sub>2</sub> concentrations were experienced at residential locations compared to 2020.

**Figure 19 - Trends in Non-Automatic Annual Mean NO<sub>2</sub> Concentrations Llandaff AQMA**

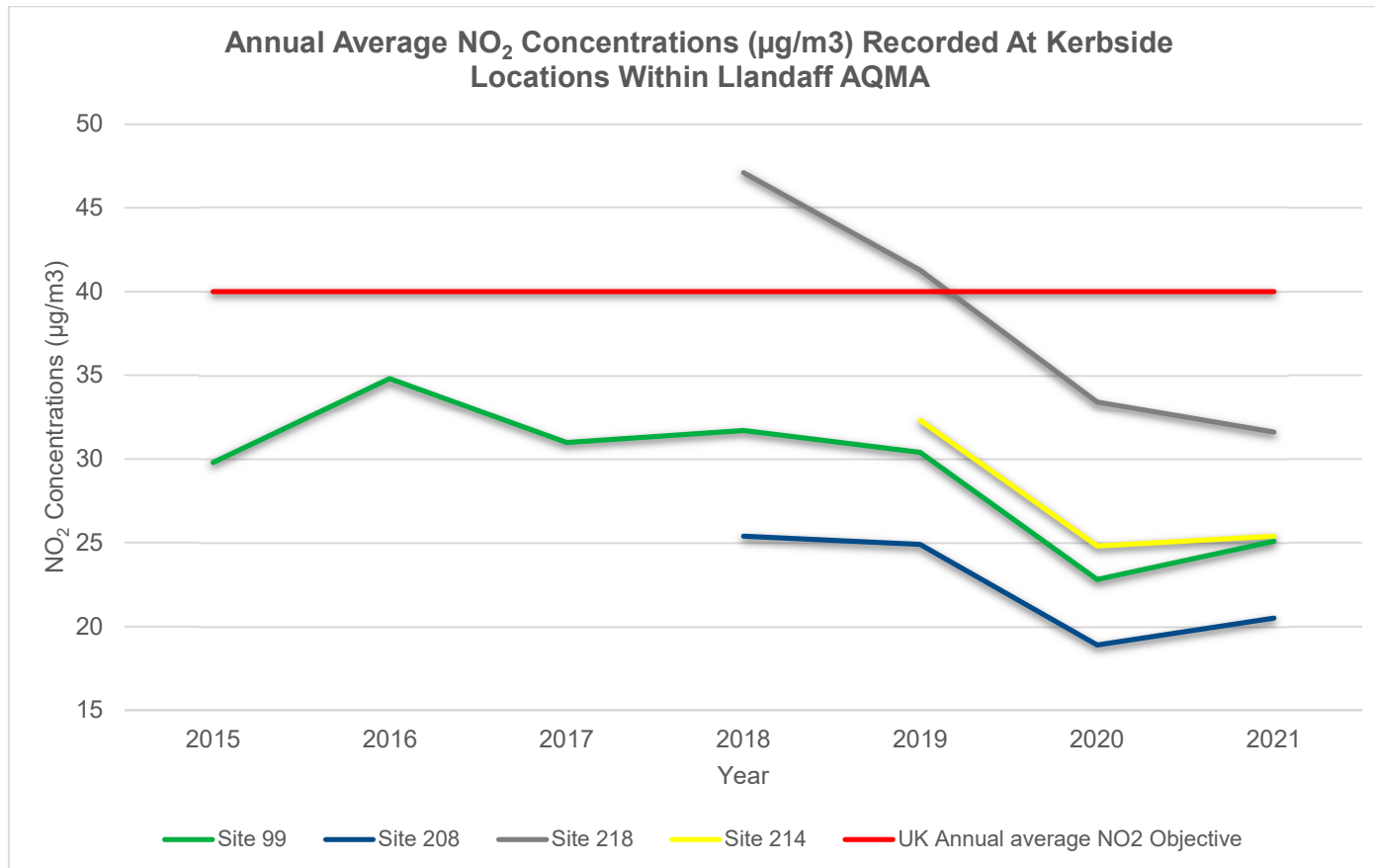


Figure 19 displays compliance in 2021 with the Annual Air Quality Objective for NO<sub>2</sub> within the Llandaff AQMA and a overall decreasing trend in NO<sub>2</sub> concentrations.

**Figure 20 – Trends Non-Automatic Annual Mean NO<sub>2</sub> Concentrations Stephenson Court AQMA**

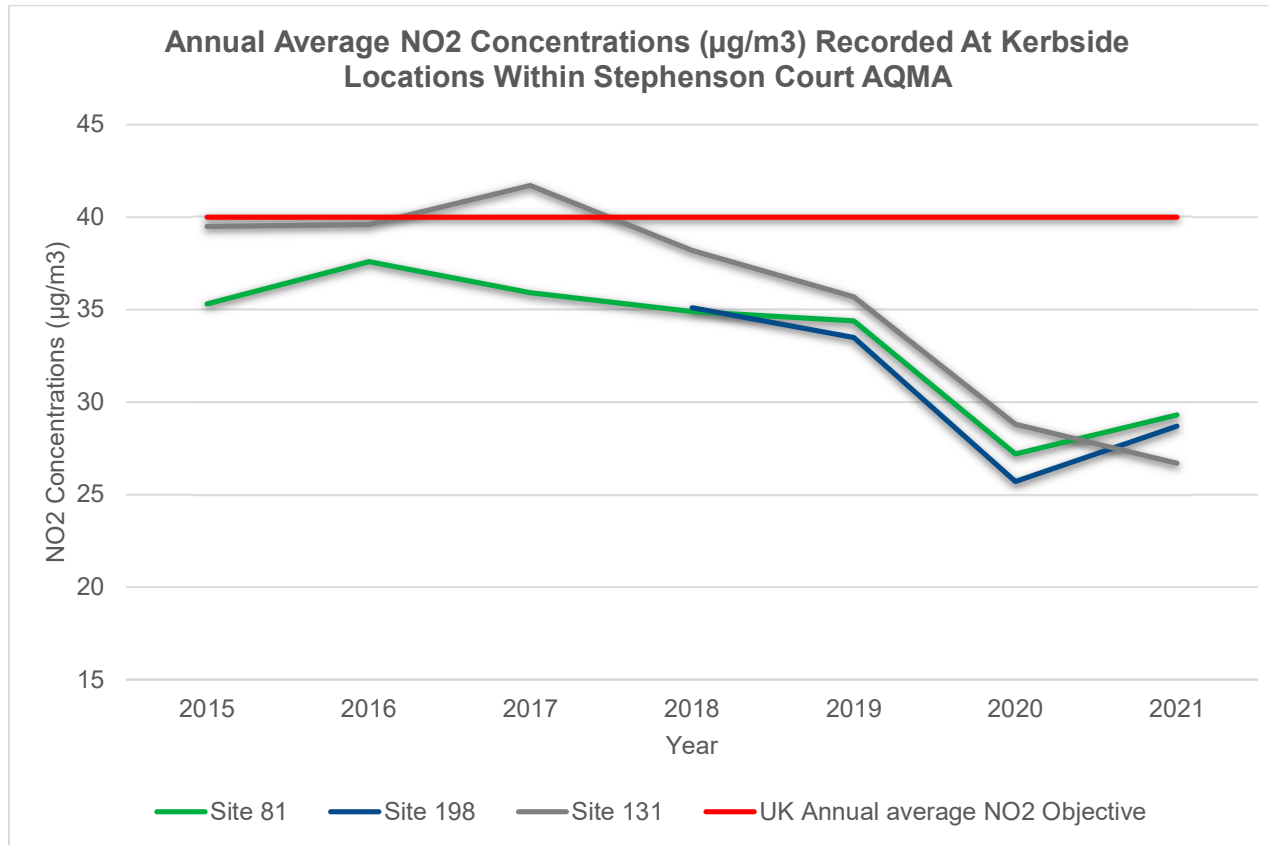


Figure 20 displays compliance in 2021 with the Annual Air Quality Objective for NO<sub>2</sub> within the Stephenson Court AQMA. A decreasing trend in NO<sub>2</sub> concentrations since 2017 can be observed.

Figure 21 - Trends in Automatic Annual Mean NO<sub>2</sub> Concentrations Cardiff City Centre AURN

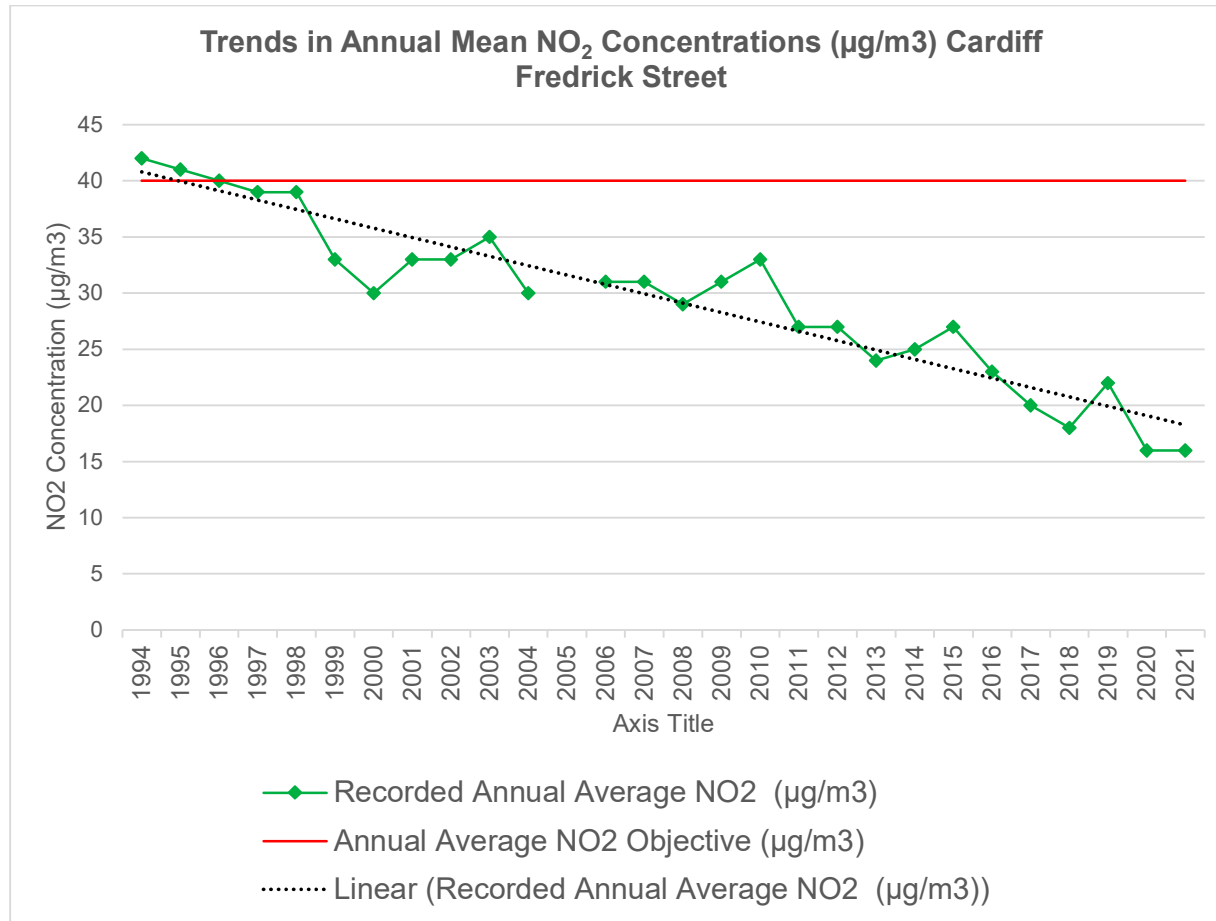


Figure 21 displays a decreasing trend in NO<sub>2</sub> concentrations experienced at the Cardiff City Centre AURN site.



**Figure 22 - Trends in Automatic Annual Mean NO<sub>2</sub> Concentrations Newport Road AURN**

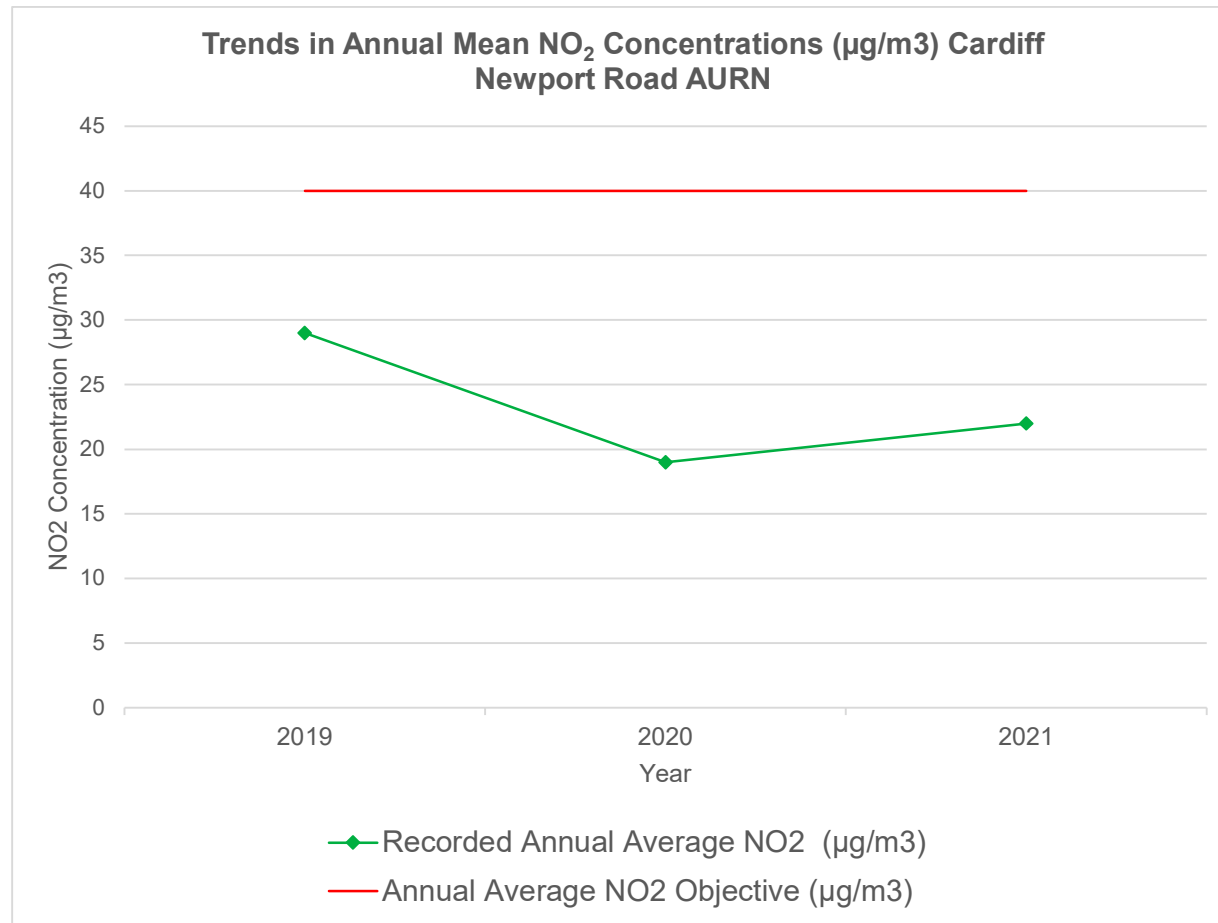


Figure 22 displays compliance with the Annual Air Quality Objective for NO<sub>2</sub> since 2019.

Table 8 - 1-Hour Mean NO<sub>2</sub> Monitoring Results, Number of 1-Hour Means > 200µg/m<sup>3</sup>

Site Name	Valid Data Capture 2021 %	Number of Hourly NO <sub>2</sub> Means (> 200µg/m <sup>3</sup> )		
		2019	2020	2021
City Centre AURN	93	0	0	0
Newport Road AURN	99	0	0	0
Cardiff Castle Street	100	-	-	0

**Notes:**

Exceedances of the NO<sub>2</sub> 1-hour mean objective (200µg/m<sup>3</sup> not to be exceeded more than 18 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table 9 - Non-Automatic Annual Mean PM<sub>10</sub> Monitoring Results (µg/m<sup>3</sup>)

Site Name	Valid Data Capture 2021 %	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2017	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2018	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2019	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2020	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2021
City Centre AURN	97	16	17	23	14	13
Newport Road AURN	97	-	-	19	17	17
Cardiff Castle Street	98	-	-	-	-	12

**Notes:**

Exceedances of the PM<sub>10</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in **bold**.

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

**Table 10 - AQMesh Indicative Annual Mean PM<sub>10</sub> Monitoring Results**

<b>AQMesh Site Name</b>	<b>Valid Data Capture 2021 %</b>	<b>PM<sub>10</sub> Annual Mean Concentration (µg/m<sup>3</sup>) 2021</b>
Westgate Street	0	N/A
Lower Cathedral Road	100	11.1
Tudor Street	100	13.9
North Road	100	9.5
Penarth Road	100	11.5
Lansdowne Road, Canton	54	16.6
Llandaff AQMA	11	9.3

**Notes:**

AQMesh automatic monitors provide indicative data

**Figure 23 – Trends in Annual Mean PM<sub>10</sub> Concentrations Cardiff City Centre AURN**

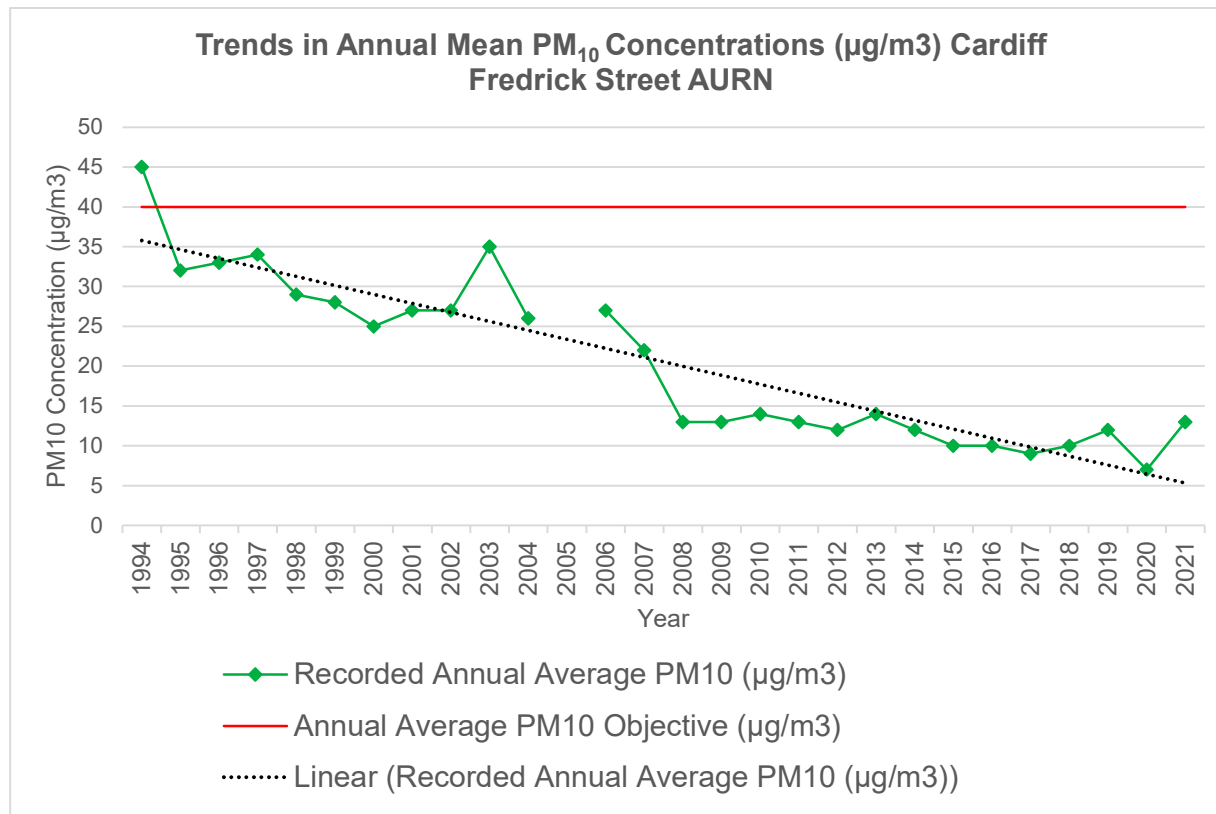


Figure 23 displays an overall decreasing trend in PM<sub>10</sub> concentrations at Cardiff City Centre AURN

**Figure 24 - Trends in Annual Mean PM<sub>10</sub> Concentrations Newport Road AURN**

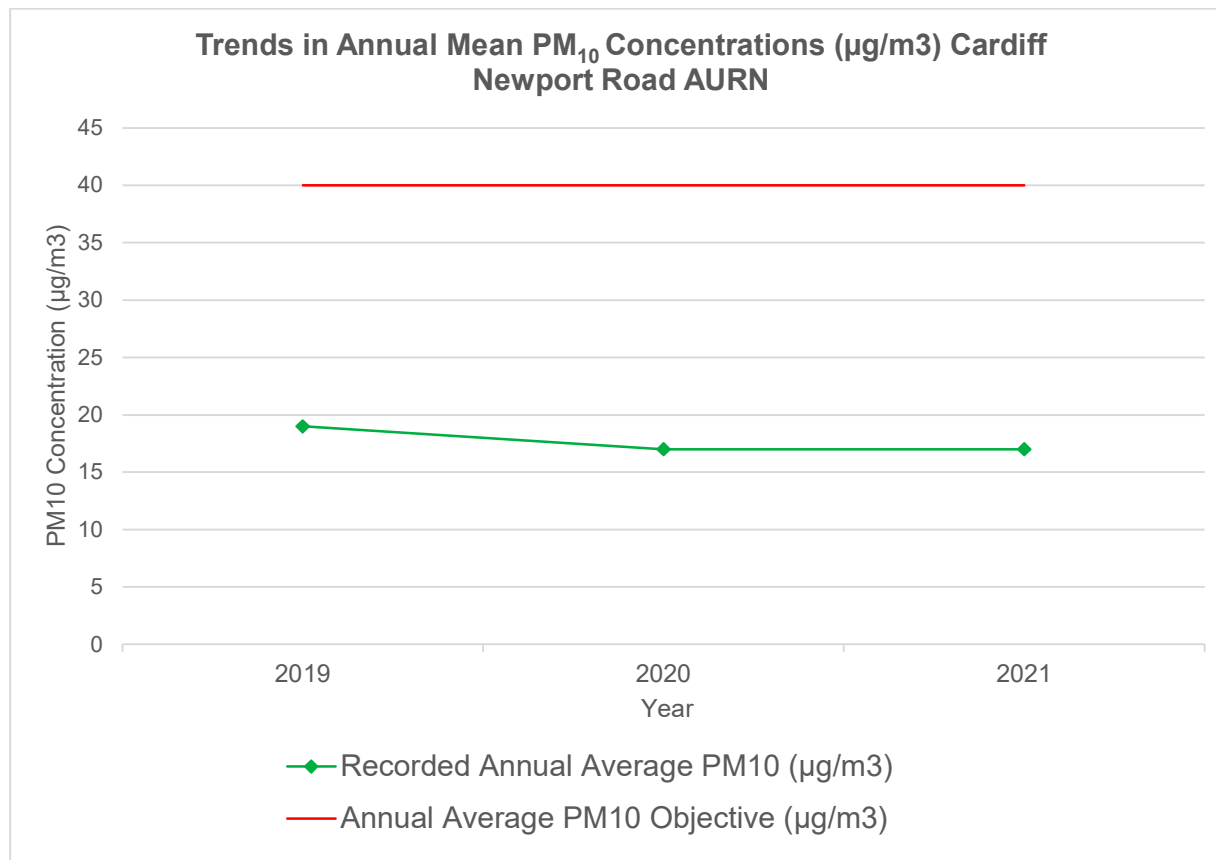


Figure 24 displays compliance with the Annual Air Quality Objective for PM<sub>10</sub> at the Newport Road AURN site since 2019.

**Table 11 - 24-Hour Mean PM<sub>10</sub> Monitoring Results, Number of PM<sub>10</sub> 24-Hour Means > 50µg/m<sup>3</sup>**

Site Name	Valid Data Capture 2021 %	PM <sub>10</sub> 24 Hour Objective (50 µg/m <sup>3</sup> ) Exceedances		
		2019	2020	2021
City Centre AURN	97	0	0	0
Newport Road AURN	97	0	0	0
Cardiff Castle Street	98	-	-	0

**Notes:**

Exceedances of the PM<sub>10</sub> 24-hour mean objective (50µg/m<sup>3</sup> not to be exceeded more than 35 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 90.4<sup>th</sup> percentile of 24-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

**Table 12 – Automatic Annual Mean PM<sub>2.5</sub> Monitoring Results**

Site Name	Valid Data Capture 2021 %	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2020	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2021
Cardiff Castle Street	91	9	9

**Notes:**

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).



Table 13 - AQMesh Indicative Annual Mean PM<sub>2.5</sub> Data

AQMesh Site Name	Valid Data Capture 2021 %	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> ) 2021
Westgate Street	0	N/A
Lower Cathedral Road	99	8.5
Tudor Street	100	10.7
North Road	100	7.8
Penarth Road	100	9.5
Lansdowne Road, Canton	54	11.4
Llandaff AQMA	11	20.72

**Notes:**

AQMesh automatic monitors provide indicative data

**AQMesh indicative concentrations**

Indicative automatic monitoring was carried out at seven locations in Cardiff. The figures below display annual trend data for nitrogen dioxide and particulate matter for five of these sites. The data from Westgate Street and Llandaff AQMA AQmesh pods are not included due to insufficient data collection for the year due to technical issues.

Figure 25 – Aqmesh Indicative Annual Trend Chart Lower Cathedral Road

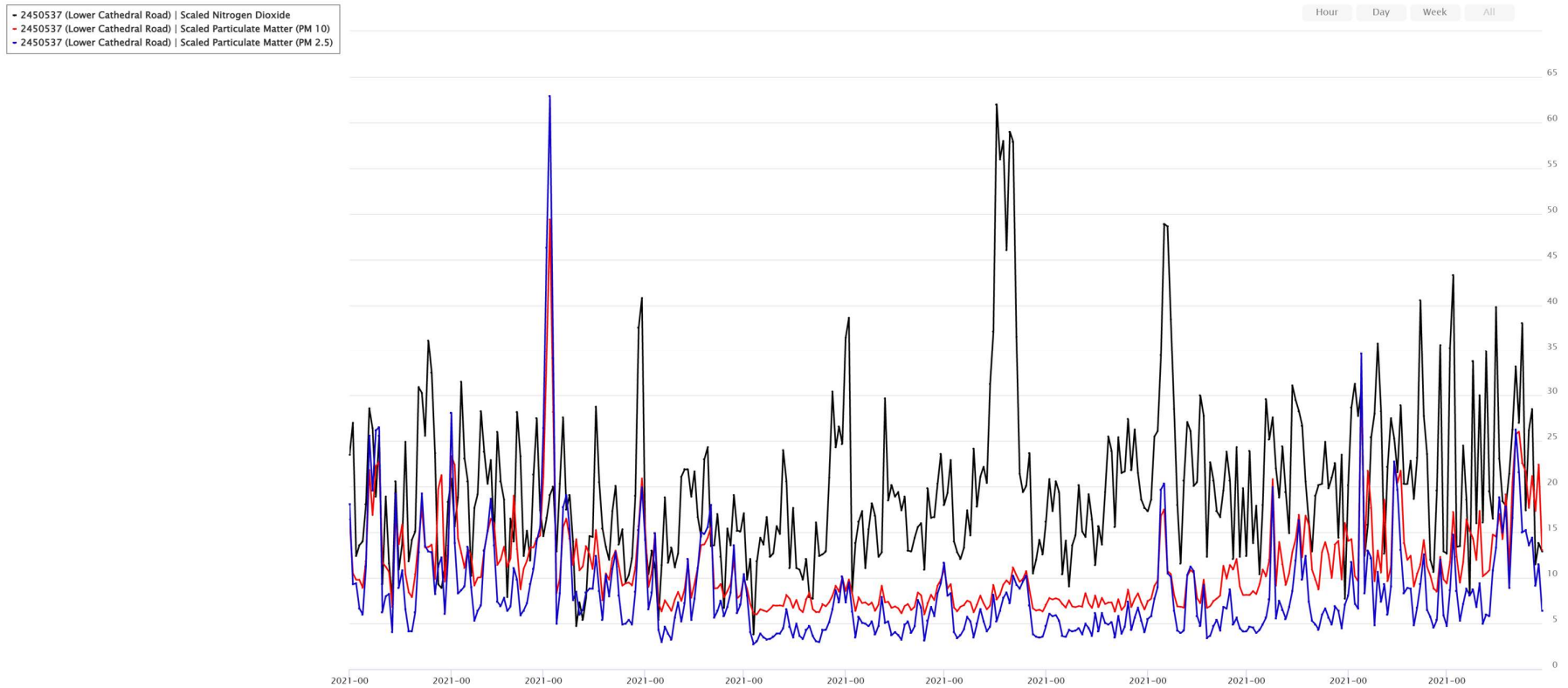
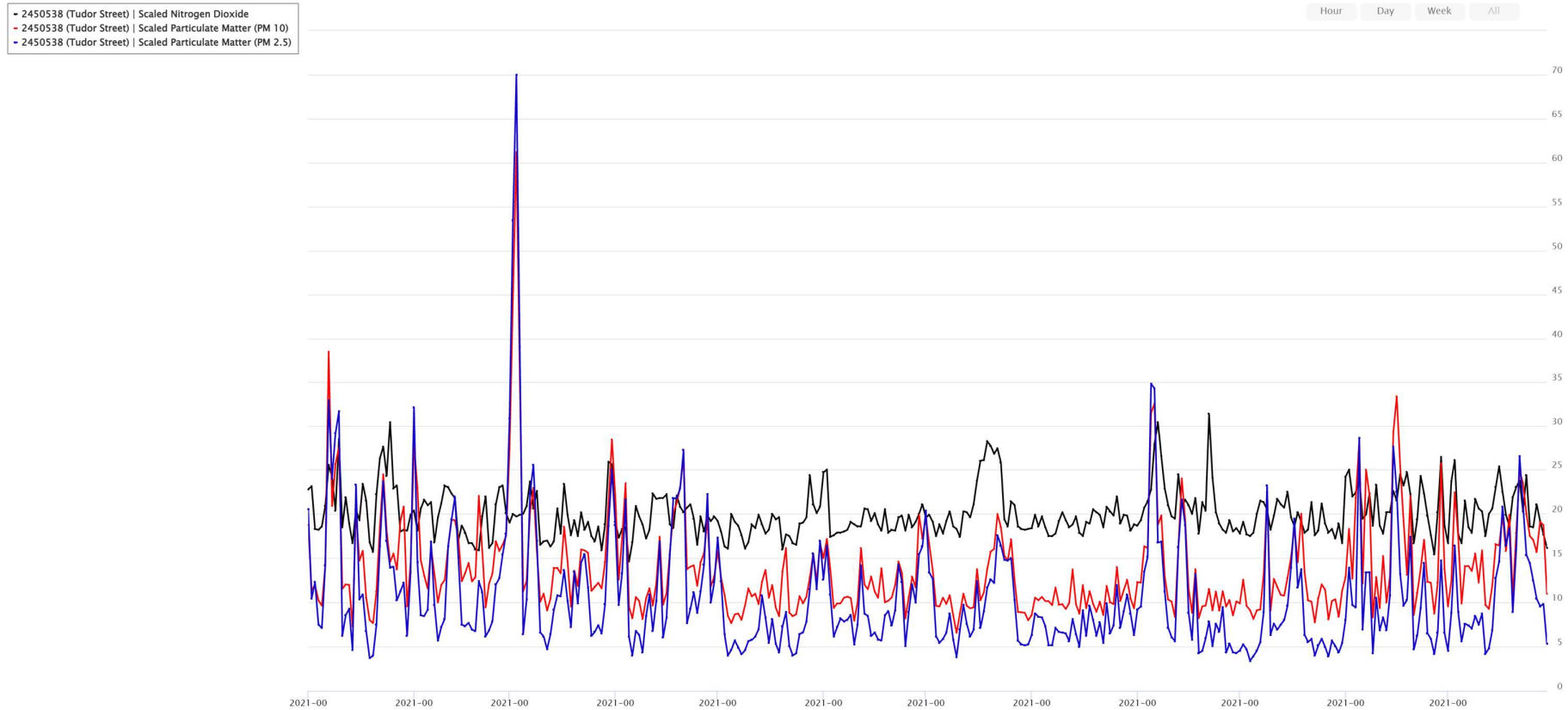


Figure 25 displays data from Lower cathedral Road indicative automatic monitor for 2021.

Figure 26 - AQMesh Indicative Annual Trend Chart Tudor Street



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Figure 26 displays data from Tudor Street indicative automatic monitor for 2021.

Figure 27 - AQMesh Indicative Annual Mean Trend Chart North Road

- 2450539 (North Road) | Scaled Nitrogen Dioxide  
- 2450539 (North Road) | Scaled Particulate Matter (PM 10)  
- 2450539 (North Road) | Scaled Particulate Matter (PM 2.5)

Hour Day Week All

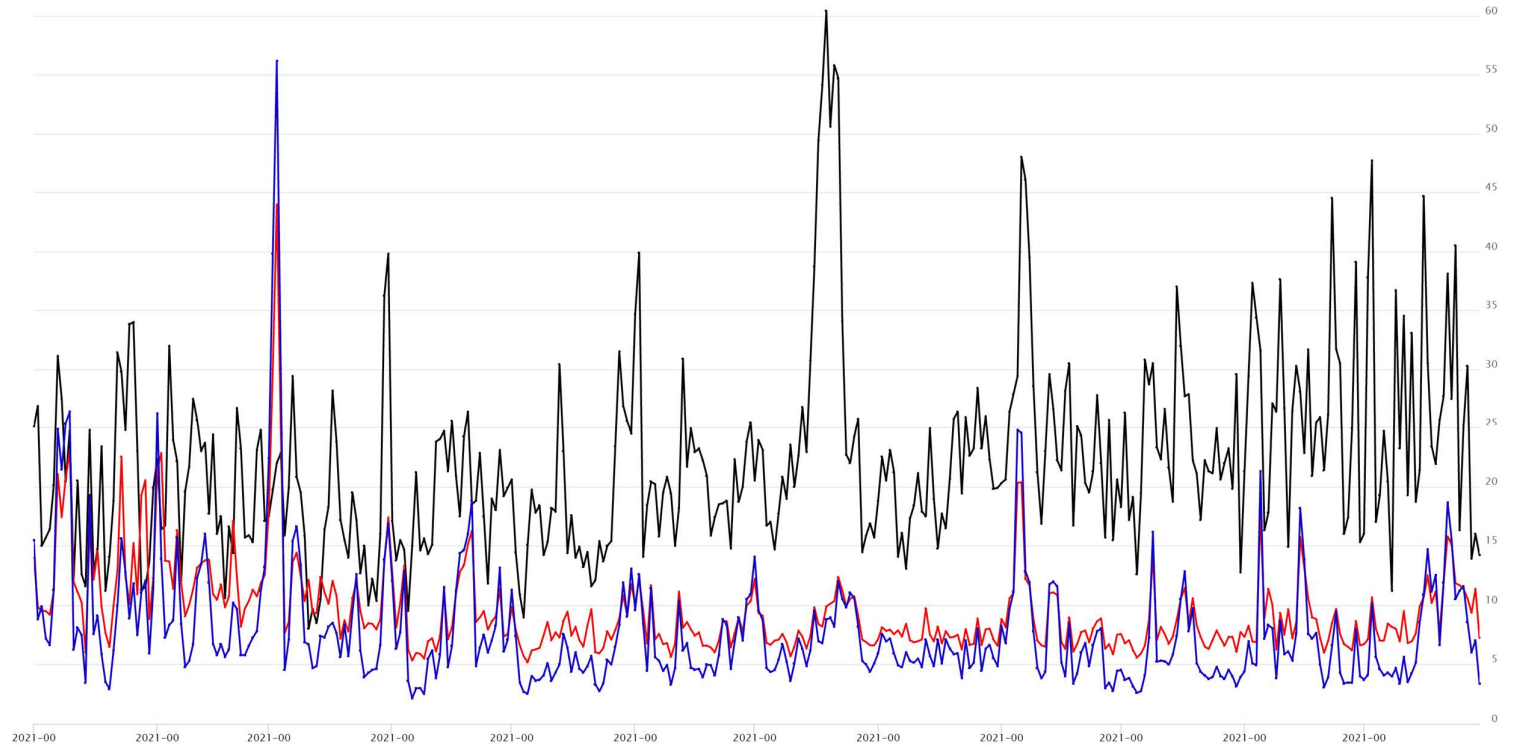


Figure 27 displays data from North Road indicative automatic monitor for 2021.

Figure 28 - AQMesh Indicative Annual Trend Chart Penarth Road

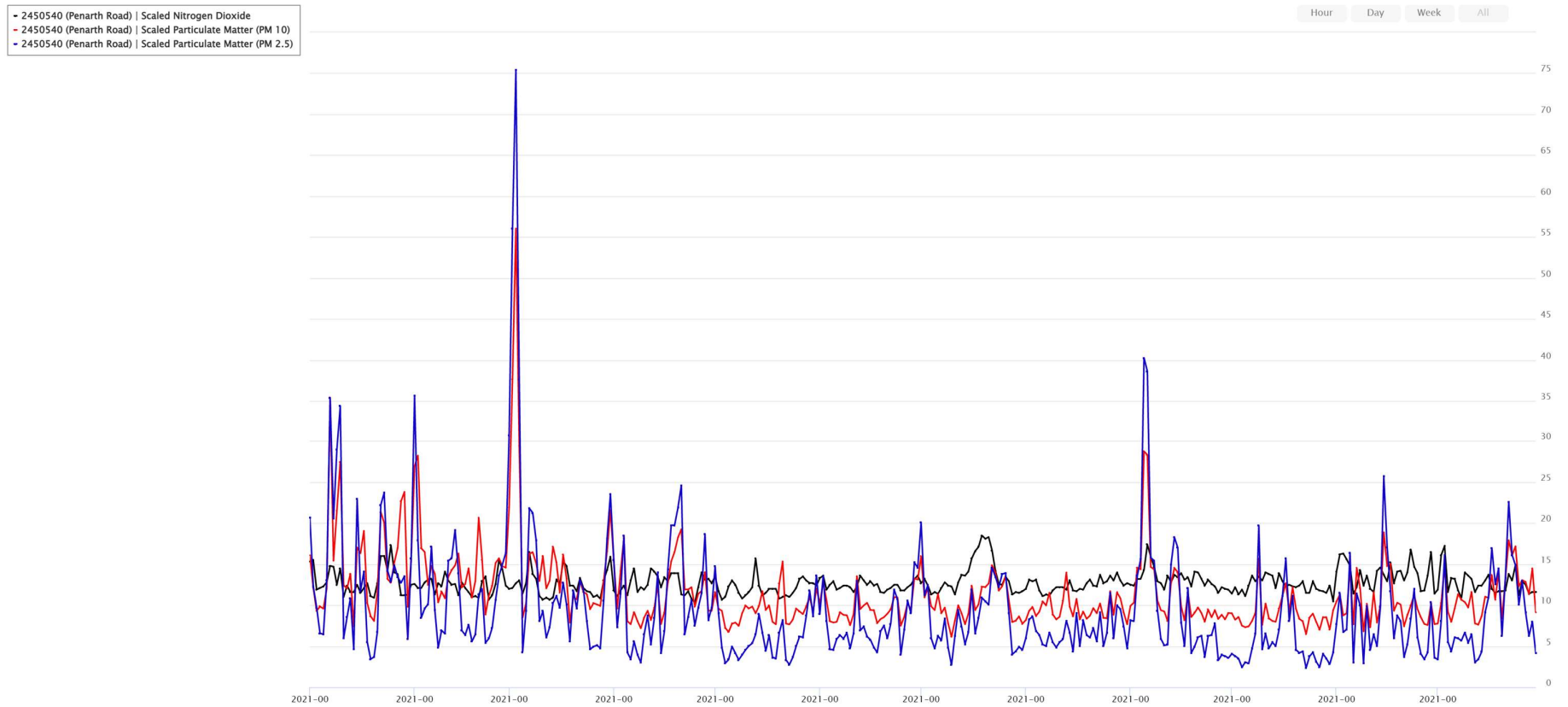
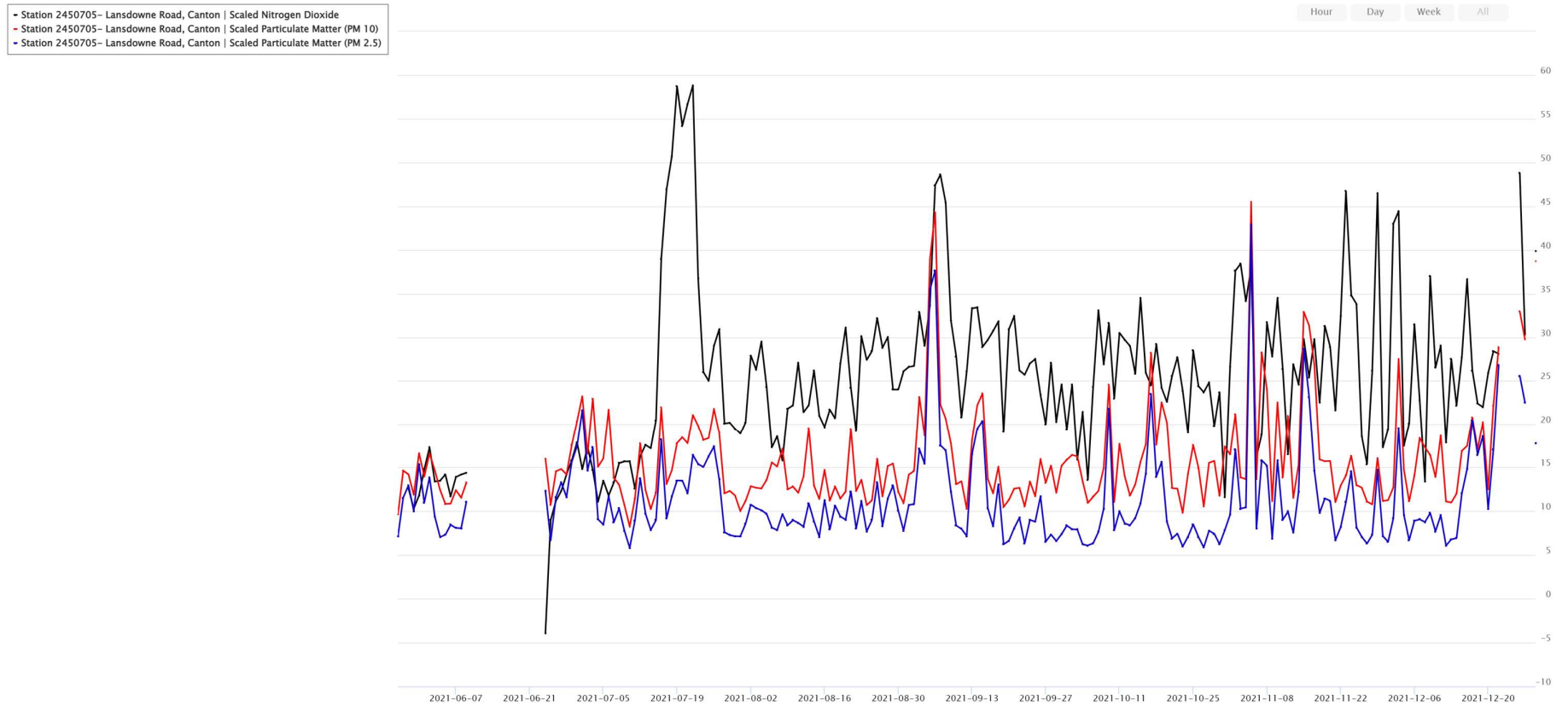


Figure 28 displays data from Penarth Road indicative automatic monitor for 2021.

Figure 29 - AQMesh Indication Annual Trend Chart Lansdowne Road, Canton



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Figure 29 displays data from Lansdowne Road indicative automatic monitor in 2021.

## 2.3 Comparison of 2021 Monitoring Results with Previous Years and the Air Quality Objectives

During 2021 monitoring was carried out for nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>10</sub>), sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO) and ozone (O<sub>3</sub>). There was no monitoring undertaken for benzene or 1-3-butadiene in line with the requirements of the LAQM regime in Wales.

### 2.3.1 Nitrogen Dioxide (NO<sub>2</sub>)

Nitrogen dioxide was measured during 2021 at three sites equipped with an automatic NO<sub>x</sub> analyser and by a network of 96 diffusion tubes. NO<sub>2</sub> was also measured by seven indicative automatic monitors in various locations.

In order to ratify the 2021 diffusion tube dataset, a bias adjustment factor of 0.78 was applied to the annual average readings. The factor was derived from the Defra website which gave the average correction factor from 24 co-location studies across the UK, whereby the analytical laboratory and method used was the same as CC. The national bias correction factor was utilized as it would provide results representative of a worst-case scenario. The bias correction factor of 0.78 was obtained from the following website: <http://laqm.defra.gov.uk/bias-adjustment-factors/national-bias.html>

There were no exceedances in either the annual or short-term Air Quality Objectives for NO<sub>2</sub> at any automatic and non-automatic monitoring site during 2021. During 2020, due to COVID-19 restrictions resulting in decreased traffic numbers on our road, reductions in NO<sub>2</sub> concentrations were seen at most monitoring sites. Results from 2021 shows slightly increased NO<sub>2</sub> concentrations compared to 2020, but still maintain a reduction compared to 2019 pre-Covid.

### 2.3.2 Particulate Matter (PM<sub>10</sub>)

As described in previous sections, monitoring of PM<sub>10</sub> has been carried out at the Cardiff Centre AURN, Newport Road AURN and Cardiff Castle Street monitoring sites. Summary data is given in Tables 9 and 11. The results of the monitoring indicate that recorded PM<sub>10</sub> concentrations at these monitoring stations are compliant with both the annual mean (40µg/m<sup>3</sup>) and 24-hour mean (>50 µg/m<sup>3</sup> not to be exceeded more than 18 times per year) Air Quality Objectives set for PM<sub>10</sub>.



### 2.3.3 Particulate Matter (PM<sub>2.5</sub>)

Monitoring for PM<sub>2.5</sub> was carried out at the Cardiff Castle Street monitoring site. Results shown in Table 6 show an annual result of 9 µg/m<sup>3</sup>. There is no formal Air Quality Objective in Wales for PM<sub>2.5</sub>, although this concentration is compliant with the EU target value of 25 µg/m<sup>3</sup>.

### 2.3.4 Other Pollutants Monitored

#### Sulphur Dioxide (SO<sub>2</sub>)

Sulphur dioxide was measured at the Cardiff Centre AURN automatic monitoring site during 2021. The site is classified as “Urban Background” and is a relevant location for the 15-minute and 1-hour Objectives. There were no exceedences of the set objectives during 2021.

#### Ozone (O<sub>3</sub>)

Ozone monitoring is useful due to its potential correlations with other pollutants. In 2021, ozone was measured at the Cardiff City Centre AURN site. The results are compared with the running 8-hour mean objective as set by the Expert Panel on Air Quality Standards (EPAQs) which states the running 8-hour mean should not exceed 100µg/m<sup>3</sup> on more than 10 days per year. There were no exceedences of the ozone objective in Cardiff in 2021.

#### Carbon Monoxide (CO)

Carbon monoxide was also monitored at Cardiff City AURN site during 2021. There were no exceedences of the Air Quality Strategy Objective for (CO) 8-hour running mean > 10 mg/m<sup>3</sup> during this period.

## 2.4 Summary of Compliance with AQS Objectives as of 2021

Shared Regulatory Services on behalf of Cardiff Council have examined the results from monitoring in all non AQMA locations. Concentrations are all below the Objectives, therefore no further action is required.

Results from monitoring in AQMA locations show concentrations, although improving, are still relatively close to the Air Quality Objectives at some monitoring points. Therefore, these AQMAs will remain under review.

## 3 New Local Developments

### 3.1 Planning Applications

The Council continues to monitor the impact of proposed developments and recent developments already underway or in use.

The following developments may either be of significance in respect of local air quality or be a proposed development where air quality is a consideration.

#### **20/01110/MJR Velindre construction access**

Application was received for the temporary construction access route for the construction of the approved Velindre Cancer Centre, for a period of no more than 48 months following the completion of the related highway improvement works.

A revised air quality assessment (AQA) was undertaken as part of this application to ascertain the likely air quality impacts associated with the amended proposal through its construction phase. The results from the assessment show that the changes in construction traffic on Pendwyallt Road and Park Road from using this access route is expected to have a negligible air quality impact on nearby sensitive human health or ecological receptors. The predicted concentrations of pollutants at receptors also remain well below the air quality objectives and therefore the air quality impacts associated with the southern access route are considered to be not significant in accordance with guidance set out by EPUK and IAQM.

As such no specific planning condition was initially requested for further mitigation in terms of air quality impacts. However the planning committee, took into consideration a number of concerns raised by local residents placed the following condition on the approval notice dated 2<sup>nd</sup> February 2021:

Condition 11: Prior to commencement of the development hereby approved details of an air monitoring unit and its location shall be submitted to and approved in writing with the Local Planning Authority. The monitoring unit shall be implemented in accordance with the approved details and remain operational until cessation of the development. Data from the air monitoring unit shall be provided to the Local Planning Authority on request.

Reason: To monitor air quality in accordance with Policy EN13 of the adopted Cardiff Local Plan (2006-2026).

The developer's appointed consultants have now installed automatic air monitoring units at various locations along the access road measuring nitrogen dioxide and particulate matter as well as implementation of a diffusion tube monitoring program. Monthly reports are issued displaying data collected in this area and can be found at the following link, <https://velindre.nhs.wales/transforming-cancer-services/news/tcs-news/air-quality/air-quality-documents/>.

**21/01666/MJR Land at Channel View Road, Grangetown, Cardiff**

*HYBRID APPLICATION FOR MIXED-USE DEVELOPMENT. OUTLINE PERMISSION FOR: THE REDEVELOPMENT AND EXTENSION OF PART OF THE CHANNEL VIEW ESTATE FOR UP TO 319 RESIDENTIAL APARTMENTS AND HOUSES, UP TO 285 SQ.M OF RETAIL FLOORSPACE (USE CLASS A1), COMMUNAL GARDENS INCORPORATING ALLOTMENTS AND PICNIC AREAS, FORMAL AND INFORMAL CHILDREN'S PLAY SPACE, LANDSCAPING, CYCLEPATHS/FOOTPATHS, DRAINAGE INFRASTRUCTURE, ROADS AND PARKING; THE REGENERATION OF THE MARL PUBLIC OPEN SPACE TO INCLUDE NEW/IMPROVED SPORTS PITCHES, CHILDREN'S PLAY SPACE, A NEW 'BEACH', WATER FEATURES, LANDSCAPING, AND CYCLEPATHS/FOOTPATHS; THE PROVISION OF A NEW BUS/CYCLE/PEDESTRIAN LINK BETWEEN CHANNEL VIEW ROAD AND SOUTH CLIVE STREET AND A NEW CYCLE/PEDESTRIAN LINK BETWEEN SOUTH CLIVE STREET AND FERRY ROAD; THE PROVISION OF A NEW PARKING AREA; TOGETHER WITH ASSOCIATED WORKS (ALL MATTERS RESERVED FOR FUTURE CONSIDERATION). FULL PERMISSION IS SOUGHT FOR A FIRST PHASE OF DEVELOPMENT COMPRISING OF NEW TOWER BLOCKS (8-13 STOREYS) PROVIDING 81 OLDER-PERSONS (OVER 55S), COMMUNITY-LIVING ACCOMMODATION UNITS, A 115SQ.M COMMUNITY CAFE, COMMUNAL GARDENS INCORPORATING ALLOTMENTS AND PICNIC AREAS, LANDSCAPING, DRAINAGE INFRASTRUCTURE, FOOTPATHS, ROADS, PARKING AND ASSOCIATED WORKS. | LAND AT CHANNEL VIEW ROAD, GRANGETOWN, CARDIFF.*

A planning application was received for a proposed 319 residential apartments and houses with associated redevelopment in the area. An air quality assessment was submitted for review, and it was determined that during the construction phase, without mitigation measures in place the risk of dust emissions are high at the worst effected receptors. The assessment detailed highly recommended mitigations to reduce or

eliminate dust emissions. With these mitigation measures in place, it was determined the risk of adverse effects due to emissions from the construction phase will not be significant.

For the operational phase of the assessment, detailed modelling has been carried out to assess the impact of air quality on existing and proposed human and ecological receptors within the area of the development. It concluded that in terms of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> exposure, the impact description of effects of changes in traffic flow as a result of the proposed development is determined to be 'negligible' at all existing receptors, and no mitigation measures are required. This application is awaiting decision.

**21/02687 Red dragon centre and County Hall, Atlantic Wharf,Cardiff**

*HYBRID PLANNING APPLICATION FOR THE PROPOSED DEVELOPMENT OF PART OF A MIXED USE MASTERPLAN WITHIN THE INNER HARBOUR, CARDIFF BAY. INCLUDING OUTLINE DETAILS FOR UP TO 890NO. RESIDENTIAL DWELLINGS (USE CLASS C3), 1,090NO. HOTEL BED SPACES (USE CLASS C1), 19,500SQM OF EMPLOYMENT FLOORSPACE (USE CLASS B1), 27,500SQM OF LEISURE FLOORSPACE (USE CLASSES D1 AND D2) AND 12,310SQM OF RETAIL FLOORSPACE (USE CLASSES A1 AND A3). PLUS ASSOCIATED PUBLIC REALM, OPEN SPACE, HARD AND SOFT LANDSCAPING, DRAINAGE, WALKING, CYCLING, CAR PARKING AND OTHER TRANSPORT INFRASTRUCTURE. TOGETHER WITH FULL DETAILS FOR A MULTI-USE, INDOOR ARENA (USE CLASS D2) WITH SUPPORTING USES AND CAFE (USE CLASS A3) A 182NO. BED SPACE HOTEL (USE CLASS C1) PLUS ASSOCIATED PUBLIC REALM, HARD AND SOFT LANDSCAPING, DRAINAGE, WALKING, CYCLING, CAR PARKING AND OTHER TRANSPORT INFRASTRUCTURE.*

A planning application was submitted detailing the above. An Air Quality Assessment (AQA) was carried out to assess the impact of the proposed development during construction and operational phases.

The significance of the overall effects of the Proposed Development has been assessed for baseline conditions only at this time. This assessment is based on professional judgement and takes into account a number of factors, including:

- Baseline pollutant concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> in 2019, 2025 and 2032 are below the relevant objectives and limit values at all existing receptors considered, with the exception of one exceedance for NO<sub>2</sub> at one specific modelled receptor (ESR 8) in 2019, which is predicted to be well below the objective level in 2025 and 2032;

- Impacts on concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are expected to be 'negligible' in all scenarios, with the exception of a 'slight beneficial' impact on NO<sub>2</sub> concentrations at ESR 1 in both the 2025 Opening Year and 2032 Future Year, which is a result of the proposed closure of Hemingway Road when the development is in place; and
- Concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are predicted to be below the objective and target levels at assessed Proposed Sensitive Receptor Locations representing the planned residential and hotel uses within the site.

It is considered that, with the application of mitigation measures during the construction phase as outlined within the AQA, the potential for generation of nuisance dust and particulate matter will be greatly reduced, and any residual effect will be 'Not Significant'.

Taking into account that there are no predicted exceedances of relevant air quality objectives and target levels and mainly negligible impacts, the residual effect of the proposed development on human receptors during the operational phase is considered to be 'Not Significant'. This application is awaiting decision.

## **3.2 Road Traffic Sources (and Other Transport)**

### **3.2.1 Narrow congested streets with residential properties close to the kerb**

Cardiff Council has considered road traffic sources extensively in both this and each year in earlier reports; the monitoring network is very largely focused on measuring concentrations of nitrogen dioxide close to many of them. These have been discussed either in previous reports or earlier in this report.

There are no newly identified road traffic sources which need to be considered.

For 2021 SRS on behalf of Cardiff Council confirms that there are no new/newly identified congested streets with a flow above 5,000 vehicles per day and residential properties close to the kerb, that have not been adequately considered in previous rounds of Review and Assessment.

### **3.2.2 Busy streets where people may spend one hour or more close to traffic**

Datasets collected from improved monitoring locations along Kingsway/ Duke Street/ Castle Street Link area have been compared to the 1-hour objective set for NO<sub>2</sub> due to the fact each site is known for commercial use at ground floor level. Levels are shown to be compliant with the objective.

An air monitoring station has been operational on Castle Street since December 2020 as part of the Welsh Automated Monitoring Network. Details of this site can be found in Table 3 and <https://airquality.gov.wales/>.

SRS on behalf of Cardiff Council confirms that there are no new/newly identified busy streets where people may spend 1 hour or more close to traffic.

### **3.2.3 Roads with high flows of buses or HGVs**

Other than Westgate Street, there are no roads in Cardiff where buses, coaches and HDVs account for >20% of road traffic, where flow of these vehicles is >2500 and there is relevant exposure within 10m of the kerb.

SRS on behalf of Cardiff Council confirms that there are no new/newly identified roads with high flows of buses/HGVs.

### **3.2.4 Junctions**

Junctions have been fully considered in previous annual reviews and assessments.

SRS on behalf of Cardiff Council can confirm that there are no new/newly identified busy junctions/busy roads where exceedances of either the nitrogen dioxide or PM<sub>10</sub> objectives are likely.

### **3.2.5 New roads constructed or proposed since the last assessment**

SRS on behalf of Cardiff Council confirms that there are no new/newly constructed roads since the last assessment.

### **3.2.6 Roads with significantly changed traffic flows**

Ratified traffic data has been examined and there are no roads in Cardiff which have experienced traffic flow (AADT) growth of 25% or more in the preceding three years.

There is increasing evidence from the traffic measurements both locally and regionally to suggest that, for economic and other reasons, traffic growth on major routes has stopped year-on-year and may even have declined recently. This has, for example, resulted in a number of air quality assessments submitted with planning applications assuming current levels of road traffic as a worst-case scenario.

It should be noted that Cardiff Council is actively implementing its traffic management policy of a 50:50 modal split, i.e. 50% of journeys being made other than by the private car. This is not just for new developments but also for the local road network as a whole.

The Council is currently considering planning applications for significant housing and mixed used developments at a number of “strategic sites” across the city.

SRS on behalf of Cardiff Council can confirm that there are no new/newly identified roads with significantly changed traffic flows.

### **3.2.7 Bus or Coach Stations**

SRS on behalf of Cardiff Council can confirm that there are no new/newly identified bus or coach stations since the last assessment.

Work at the Central Square Transport Interchange is ongoing and is due for completion in 2022.

### **3.2.8 Airports/ Diesel or Steam Trains / Ports and Shipping**

There are no airports in Cardiff. The nearest airport is Cardiff International which is located approximately 15 miles to the west of Cardiff in The Vale of Glamorgan Council's area.

There are no airports planned or proposed within the Council's area.

Cardiff is well-served by passenger rail transport. The main Swansea to London Paddington line is served by Cardiff Central Station. Additionally, there is a network of local-line services running, in the main, to the valleys north of Cardiff. LAQM.TG(22) suggests that SO<sub>2</sub> emissions from diesel locomotives may be significant if there are outdoor locations where locomotives are regularly stationary for more than 15minutes and where members of the public could be regularly exposed over this period at such locations. LAQM.TG(22) also requires consideration exposure to nitrogen dioxide within 30m of certain specified railway lines in those areas where the annual mean background concentration is above 25µgm<sup>-3</sup>

Stationary trains have been considered fully in earlier reports with regard to potential exceedances of the sulphur dioxide objective. No potential exceedances were found, and nothing has changed in this regard since then. There is no need to further assess this source.

It should be recorded that works are now underway in preparation for the electrification of

the main Swansea/Cardiff to London Paddington line. The effects of this on local emissions can be only beneficial.

Discussions with regard to the electrification of the local line network are ongoing.

SRS on behalf of Cardiff Council confirms that there are no locations where diesel or steam trains are regularly stationary for periods of 15 minutes or more, with potential for relevant exposure within 15m.

### **3.3 Industrial / Fugitive or Uncontrolled Sources / Commercial Sources**

#### **3.3.1 Industrial installations: new or proposed installations for which an air quality assessment has been carried out.**

SRS on behalf of Cardiff Council can confirm that in 2021 there were no new or proposed industrial installations for which an air quality assessment has been carried out.

#### **3.3.2 Industrial installations: existing installations where emissions have increased substantially or new relevant exposure has been introduced.**

SRS on behalf of Cardiff Council can confirm that in 2021 there were no existing industrial installations where emissions have increased substantially or a new relevant exposure has been introduced.

#### **3.3.3 Industrial installations: new or significantly changed installations with no previous air quality assessment.**

SRS on behalf of Cardiff Council can confirm that in 2021 there were no new or significantly changed installations with no previous air quality assessment.

#### **3.3.4 Major fuel storage depots storing petrol**

As reported in the 2012 USA, there is one major fuel (petrol) storage depot in Cardiff in Cardiff Docks which was assessed in previous reports. This installation is subject to an EPR Permit and regulated by the Council. Capacity and throughput at this site has not altered significantly for the worse since the last assessment and no new relevant exposure exists.



SRS on behalf of Cardiff Council can confirm that there are major fuel (petrol) storage depots within the Local Authority area, but these have been considered in previous reports.

### **3.3.5 Petrol Stations**

There are no new petrol stations in Cardiff with throughputs greater than 2000m<sup>3</sup> per annum with a busy road nearby where there is relevant exposure within 10m of the pumps.

It is not necessary, therefore, to consider this further.

SRS on behalf of Cardiff Council can confirm that there are no petrol stations meeting the specified criteria.

### **3.3.6 Poultry Farms**

The criteria for assessing poultry farms are set out in Table 7.3, point 4 of TG(22) (Defra, 2022). No farms exceeding the relevant criteria (turkey units with greater than 100,000 birds, naturally ventilated units with greater than 200,000 birds or mechanically ventilated units with greater than 400,000) have been identified.

SRS on behalf of Cardiff Council can confirm that there are no poultry farms meeting the specified criteria.

### **3.3.7 New Developments with Fugitive or Uncontrolled Sources**

There are no new locations where fugitive could occur which have not been covered by previous rounds of review and assessment and no locations where new relevant exposure has been introduced to existing locations.

It is not considered necessary to consider this further at this time.

SRS on behalf of Cardiff Council can confirm that there are no potential sources of fugitive particulate matter emissions in the Local Authority area.

## **3.4 Other Sources**

### **3.4.1 Domestic Wood Burners**

Previous reports have confirmed that there are no known areas in Cardiff where coal or solid fuel burning provides a significant level or primary household heating. Nothing has changed in this regard since the 2018 APR, despite the potential for increasing popularity of solid fuel heating with increased fossil-fuel prices, and there is no need to consider this further at this time.

It should be noted that the Council receives a number of enquiries each year from residents in respect of national or local requirements were they to wish to install log-burners or similar appliances in their homes. There are no smoke control area in Cardiff and hence no legal requirements with regard to appliances that may be installed.

However, residents are always reminded of the legislation in respect of statutory smoke nuisance and, where they can't be persuaded otherwise for reasons of air quality and health, recommended to seek out an appliance certified for use in a smoke control area.

SRS on behalf of Cardiff Council can confirm that there are no areas of significant domestic fuel use in the Local Authority area.

## **4 Policies and Strategies Affecting Airborne Pollution**

### **4.1 Local / Regional Air Quality Strategy**

#### **4.1.1 Cardiff's Clean Air Strategy and Action Plan**

SRS on behalf of Cardiff Council have coordinated and developed a Clean Air Strategy (CAS) & Action Plan document. The document outlines a citywide approach to mitigate poor air quality in Cardiff and recognises that interventions to address poor air quality cannot be utilised in silo and implemented locally. Therefore citywide measures need to be put into practise to hopefully provide citywide improvements to air quality.

The document fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP). The document also captures the Direction given to CC in March 2018 by WG for Cardiff to address its air quality concerns along highlighted major road networks

### **4.2 Air Quality Planning Policies**

#### **4.2.1 Cardiff's Local Development Plan 2006-2026**

Cardiff's LDP 2006-2026, forms the basis for decisions on land use planning in Cardiff up to 2026 and assumes that, within the plan's time frame, approximately 40,000 new jobs and 41,100 new dwellings will be developed in Cardiff as a direct response to Cardiff's role as the economic driver of the City- region.

In addition to its independent examination, the LDP was subject to a Strategic Environmental Assessment (SEA) to ensure that the policies reflect sustainability principles and take into account environmental impacts.

Policy KP2 of the LDP allocates 8 Strategic Sites to help meet the need for new dwellings and jobs. These strategic allocations on both greenfield and brownfield sites will include 500 homes or more and/or include significant employment/mixed uses which will bring significant benefits to the city. The sites are:

- (i) Cardiff Central Enterprise Zone;
- (ii) Former Gas Works, Ferry Road;

- (iii) North West Cardiff;
- (iv) North of Junction 33 on the M4;
- (v) South of Creigiau;
- (vi) North East Cardiff (West of Pontpennau);
- (vii) East of Pontpennau Link Road; and
- (viii) South of St. Mellons Business Park – Employment Only.

The LDP identifies that sustainable transportation solutions are required in order to respond to the challenges associated with new development by setting out an approach aimed at minimising car travel, maximising access by sustainable transportation and improving connectivity between Cardiff and the wider region.

The Plan sets out a strategy to achieve this by making the best use of the current network, managing demand and reducing it where possible by widening travel choices. The aim is to secure a modal split of 50% car and 50% non-car modes.

The following LDP policies are of relevance to air quality;

#### **KP8: SUSTAINABLE TRAVEL**

*For Cardiff to accommodate the planned levels of growth, existing and future residents will need to be far less reliant on the private car. Therefore, ensuring that more everyday journeys are undertaken by sustainable modes of transport, walking, cycling and public transport, will be essential.*

Development in Cardiff will be integrated with transport infrastructure and services in order to:

- i. Achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport.
- ii. Reduce travel demand and dependence on the car;
- iii. Enable and maximise use of sustainable and active modes of transport;
- iv. Integrate travel modes;
- v. Provide for people with particular access and mobility requirements;
- vi. Improve safety for all travellers;
- vii. Maintain and improve the efficiency and reliability of the transport network
- viii. Support the movement of freight by rail or water; and
- ix. Manage freight movements by road and minimise their impacts

#### **KP14: HEALTHY LIVING**

*Cardiff will be made a healthier place to live by seeking to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants of health and providing accessible health care facilities. This will be achieved by supporting*

*developments which provide for active travel, accessible and useable green spaces, including allotments.*

**KP18: NATURAL RESOURCES:**

*In the interests of the long-term sustainable development of Cardiff, development proposals must take full account of the need to minimise impacts on the city's natural resources and minimise pollution, in particular the following elements.....minimising air pollution from industrial, domestic and road transportation sources and managing air quality.*

**EN13: AIR, NOISE, LIGHT POLLUTION AND LAND CONTAMINATION**

*Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.*

**C6: HEALTH**

*Priority in new developments will be given to reducing health inequalities and encouraging healthy lifestyles through:*

- i. Identifying sites for new health facilities, reflecting the spatial distribution of need, ensuring they are accessible and have the potential to be shared by different service providers; and*
- ii. Ensuring that they provide a physical and built environment that supports interconnectivity, active travel choices, promotes healthy lifestyles and enhances road safety.*

The LDP also outlines the approach the Council will take to increase the proportion of people travelling by sustainable modes and to achieve the 50:50 modal split target.

This will involve:

- enabling people to access employment, essential services and community facilities by walking and cycling through, for example, high quality, sustainable design and measures to minimise vehicle speed

- and give priority to pedestrians and cyclists;
- developing strategic bus and rapid transit corridor enhancements and facilitating their integration with the wider transport network;
- facilitating the transfer between transport modes by, for example, improving existing interchanges and developing new facilities such as strategically located park and ride facilities; and
- maximising provision for sustainable travel within new developments and securing infrastructure investment which can support modal shift within existing settlements.

#### **4.2.2 Replacement LDP**

The Council agreed with Welsh Government in March 2021 a timetable to prepare a Replacement LDP to cover the period 2021 to 2036. The timetable proposes a 3.5 year preparation process with adoption of the Replacement LDP due at the end of 2024.

The first stage in preparation of the Replacement LDP was consultation on the Vision, Issues and Objectives for the plan which was completed in summer 2021. Following this consultation Cabinet and Council agreed a Vision and Objectives for the plan in September 2021. The agreed Vision and Objectives includes a commitment to create healthier environments, reduce inequalities and enhance wellbeing including specifically setting out how air quality can be enhanced. This agreed Vision and Objectives will set the context for the plan as it evolves in more detail through the preparation process over the next few years.

### **4.3 Local Transport Plans and Strategies**

#### **4.3.1 Transport White Paper**

The Transport White Paper was launched on 15 January 2020 and lays out an ambitious 10- year plan to tackle the climate emergency, reduce congestion and improve air quality. It includes proposals for developing the South East Wales Metro, including new Metro lines connecting new and existing communities in the city, Rapid Bus Transport, Active Travel and improvements to our streets and the future of the car, including reducing car ownership through car clubs and greening through the expansion of EV charging infrastructure. Key regional projects are identified, with significant improvements proposed for all the major routes into the city. It also outlines the intention to consider all delivery options and to work with Welsh Government to develop a comprehensive investment plan. The timescale for the White Paper was

amended in line with ongoing developments in relation to the Clean Air Plan to ensure alignment. The document is available at;

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/transport-white-paper/Documents/White%20Paper%20for%20Cardiff%20Transport%202019.pdf>

## 4.4 Active Travel Plans and Strategies

In September 2014, the Welsh Government introduced the Active Travel (Wales) Act. This measure legally requires Welsh local authorities to map and plan suitable routes for Active Travel within certain areas, as designated by the Welsh Government.

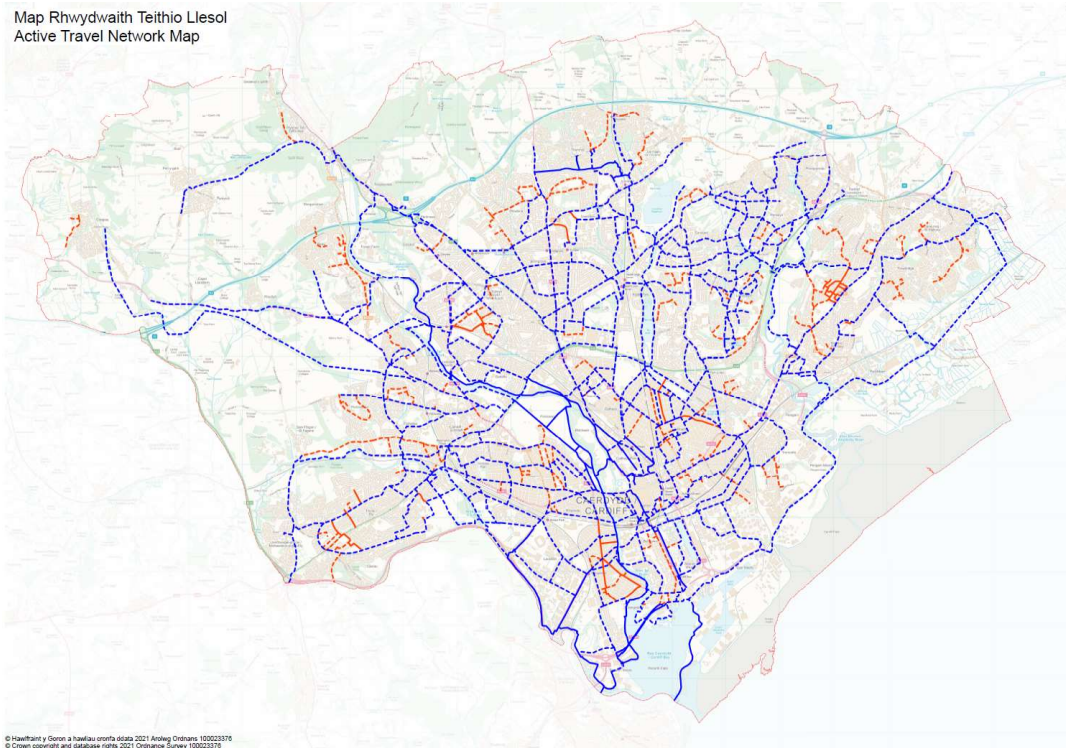
The Cardiff Cycling Strategy sets out an ambitious vision to double the number of cycling trips by 2026, from a 9.2% modal share in 2015 to 18.4% in 2026. In order to achieve this vision, it will be necessary to develop a comprehensive network of cycling infrastructure which is suitable for use by people of all ages and abilities, and to work with key partners from employers, retail and schools to ensure that appropriate cycling facilities are provided at destinations and to promote cycling.

In 2021 the Council commenced a detailed consultation on an updated draft Active Travel Network Map for Cardiff has been developed to take account of:

- Proposals to improve routes for walking and cycling set out in the Transport White Paper, including a network of segregated Cycleway routes;
- Routes required to connect strategic development sites to existing communities and key destinations, including the City Centre and Cardiff Bay; and
- Routes required to access important local destinations across the city, including schools and local shops

Analysis of the feedback received to the Commonplace engagement undertaken between November 2020 and January 2021, which identified additional locations where improvements for walking and/or cycling are required. A 12 week statutory consultation on the draft plan was undertaken by the CC between August and October 2021.

**Figure 30 - Draft Active Travel Network Map**



## **4.5 Local Authorities Well-being Objectives**

In 2015 Welsh Government made a new law called the Well-being of Future Generations (WFG) (Wales) Act. The new law has the sustainable development principle at its heart. This means that we need to work in a way that improves wellbeing for people today without doing anything that could make things worse for future generations. There are seven national well-being goals that form the basis of the Act and five ways of working which support the goals.

CC adopts the principles of The Well-being of Future Generations (Wales) Act 2015. The Act is a significant enabler to improve air quality as it calls for sustainable cross-sector action based on the principles of long-term, prevention-focused integration, collaboration and involvement. It intends to improve economic, social, environmental and cultural well-being in Wales to ensure the



needs of the present are met without compromising the ability of future generations to meet their own needs.

#### 4.5.1 Cardiff Well-Being Plan 2018-23

Under the WFG Act the Cardiff Public Services Board (PSB) has produced its Well-Being Plan for 2018- 2023, which sets out the Cardiff PSB's priorities for action over the next 5 years, and beyond. The Plan contains Well-being Objectives, high-level priorities that the Cardiff PSB have identified as being most important. It also contains 'Commitments,' or practical steps that the city's public services, together, will deliver over the next 5 years. The Well-Being Plan has set out Well-Being Objectives as follows:

- **Objective 1** - A Capital City that Works for Wales;
- **Objective 2** - Cardiff grows in a resilient way;
- **Objective 3** -Safe, Confident and Empowered Communities
- **Objective 4** - Cardiff is a great place to grow up;
- **Objective 5** - Supporting People out of poverty;
- **Objective 6** - Cardiff is a great place to grow older; and
- **Objective 7** -Modernising and Integrating Our Public Services

Within the Well-Being Plan Objective 2 details the following; *Cardiff is one of Britain's fastest growing cities, and is by far the fastest growing local authority area in Wales. Successful cities are those in which people want to live and this growth is welcomed and a sure sign of strength for the city. However, this growth will bring challenges too, putting pressure on both the city's physical infrastructures, community cohesion, its natural environment and public services. Managing the impacts of this population growth and of climate change in a resilient and sustainable fashion will be a major long term challenge for Cardiff.*

Improving levels of NO<sub>2</sub> and particulate matter (PM<sub>10</sub>, 2.5) is a City level outcome indicator that the PSB will seek to impact in order to meet this specific Objective. The Plan forecasts a future Cardiff with improved air quality and has committed to taking 'a *city-wide response to air pollution through supporting the development and delivery of a Cardiff Clean Air Strategy.*

## 4.6 Green Infrastructure Plans and Strategies

Outlined in Cardiff's Local Development Plan (LDP) 2006- 2026, Policy **KP16** focuses upon Green infrastructure.

### **Policy KP16 Green Infrastructure**

The policy aims to ensure that Cardiff's green infrastructure assets are strategically planned and delivered through a green infrastructure network. Other policies in the Plan provide more detailed guidance on aspects of these assets, together with supporting SPG.

Where development is permitted, planning conditions and/or obligations will be used to protect or enhance the natural heritage network.

New developments should incorporate new and / or enhanced green infrastructure of an appropriate size, type and standard to ensure no fragmentation or loss of connectivity.

Where the benefits of development outweigh the conservation interest, mitigation and/or compensation measures will be required to offset adverse effects and appropriate planning obligations sought. The implementation of policies designed to provide and protect public open space throughout Cardiff would also serve to offset any increase in recreational pressure on the Cardiff Beech Woods SAC, thereby helping to avoid likely significant effect upon that site.

Management of Cardiff's green infrastructure network should be in place prior to development, and appropriate planning obligations sought. SPG on this topic will more fully outline the extent of Cardiff's green infrastructure and how this policy can be implemented in more detail.

As previously mentioned a new Supplementary Planning Guidance (SPG) concerning Green Infrastructure was approved in 2017 by CC to provide a detailed understanding to the elements raised in the LDP.

- This document provides planning advice on a number of areas relating to development and the environment, including protection and provision of open space, ecology and biodiversity, trees, soils, public rights of way, and river corridors.
- The new document also differs from previous SPGs by providing more in depth design advice, aimed at giving developers a clearer understanding of the approach expected when submitting designs for new developments. By having this information up-front developers are better able to provide suitable designs to the Council through the planning process.

## 4.7 Climate Change Strategies

Cardiff Council declared a climate emergency in 2019 and has since been preparing the One Planet Strategy which sets out how we will respond and tackle this emergency and become carbon neutral Zero as a Council and a City by 2030. A draft One Planet strategy was published for consultation in October 2020 and public feedback on this, alongside a detailed analysis of the Council and city's current carbon position, have informed and shaped the final 2021 One Planet Cardiff Strategy report and action plan.

In producing the 2021 OPC Strategy the Council has completed a detailed carbon baselining and impact assessment. This key milestone has enabled an understanding of the current carbon position, both of Council operations and also of the wider City.

The OPC Strategy confirms the Council's commitment to ensuring that Cardiff will become a Carbon Neutral Council by 2030. It also confirms the Council's commitment to work in partnership with city wide stakeholders to determine a pathway to achieve a Carbon Neutral City by 2030. Full details of the final strategy are available at <https://www.oneplanetcardiff.co.uk/>

## **5 Conclusion and Proposed Actions**

### **5.1 Conclusions from New Monitoring Data**

Monitoring data for 2021 indicates that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure within the already established AQMAs are compliant with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). The results are indicative that the impacts of the COVID lockdowns and restrictions at the beginning of 2021, and the subsequent behavioural changes once restrictions were lifted, may have influenced pollution levels in Cardiff in 2021. It is therefore likely that the concentrations recorded in 2021 are not representative of a true business as usual scenario and the results have generated a bias/ underestimation of levels of pollution across Cardiff in 2021.

Therefore, monitoring within the AQMAs has continued in 2022, consideration of any future actions for the AQMAs will be assessed by the Council once an assessment of the longer term recovery from Covid has been determined.

### **5.2 Conclusions relating to New Local Developments**

SRS on behalf of Cardiff Council will continue to monitor data gathered by the developer's air quality consultants for Velindre Construction Access 20/011110/MJR, as part of planning condition 11.

*Condition 11: Prior to commencement of the development hereby approved details of an air monitoring unit and its location shall be submitted to and approved in writing with the Local Planning Authority. The monitoring unit shall be implemented in accordance with the approved details and remain operational until cessation of the development. Data from the air monitoring unit shall be provided to the Local Planning Authority on request*

### **5.3 Other Conclusions**

The implementation of COVID measures in the City Centre accelerated the Council's achievement of compliance with limit values for NO<sub>2</sub> under the Ambient Air Quality Directive, on Castle Street. The Interim implementation of the Castle

Street Scheme as approved by Welsh Government, was completed at the end of October 2021. The Council has ensured ongoing monitoring has been undertaken. At the time of writing this report further assessments using updated traffic data, collected post Covid, is being undertaken so as the Council can undertake further detailed assessments in order to identify the most suitable permanent solution for Castle Street. The assessments will enable the Council to comply with the most recent legal direction from Welsh Government.

## **5.4 Proposed Actions**

As a result of the information provided herein it is proposed to

1. Deliver and implement the proposed mitigation measures quantified within the Clean Air Plan;
2. Continue monitoring within and around the existing AQMAs and other areas of concern. The diffusion tube network appointed by SRS on behalf of Cardiff Council will be reviewed and an assessment on locations made;
3. Ensure implementation of the updated Realtime Monitoring Network is completed early 2023.
4. Continue to drive Air Quality as a major aspect to be considered during any planning applications, most importantly Cardiff Central Development;
5. Submit an Annual Progress Report (APR) in 2023; and
6. Update the existing Clean Air Strategy and Action Plan to represent most recent actions in 2023.

## References

Department for Environment, Food and Rural Affairs, 2003. *Part IV of the Environment Act 1995, Environment (Northern Ireland) Order 2002 Part III Local Air Quality Management, Technical Guidance LAQM.TG(16)*. London: DEFRA (August 2021).

Welsh Government, Local Air Quality Management in Wales, Policy Guidance, June 2017.

Cardiff Council 2021 Annual Progress Report

Cardiff Council Clean Air Plan 2019

## **Appendices**

Appendix A: Monthly Diffusion Tube Monitoring Results

Appendix B: A Summary of Local Air Quality Management

Appendix C: Air Quality Monitoring Data QA/QC

Appendix D: AQMA Boundary Maps

# Appendix A: Quality Assurance / Quality Control (QA/QC) Data

## Table 14 - Full Diffusion Tube Monthly Results 2021 ( $\mu\text{g}/\text{m}^3$ )

WAQF Number 2021	Cardiff Council Site ID	Site Name	X (Easting)	Y (Northing)	Site Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	AVE	Biased Adjusted Annualise d	
CCC-036	16	167 Nisan Park Road	317040	176080	Roadside	33.4	41.6	31.7	25.2	26.5	17.4	25.3	20.3	31.9	34.2	34.9	35.2	29.8	<b>23.2</b>	
CCC-083	258	Lampool outside 116 Penarth Road (REPLACEMENT Co-Location)	317760	175310	Roadside	29	43.5	44.2	40.6	31.6	22.9	33.8	34.7	41.4	37.8	52.3	40.2	37.7	<b>29.4</b>	
CCC-092	58	Westgate Street	317937	176400	Kerbside	51.9	33.3	33.6	36.2	37.7	32.3	32.4	31.7	46.9	41.6	50.3	46.1	39.5	<b>30.8</b>	
CCC-115	81	Stephenson Court	319387	176980	Roadside	45.9	36.2	38.4	33.4	36	31	29.2	32.8	37.8	39	49.3	41.2	37.5	<b>29.3</b>	
CCC-120	86	19 Fair Oak Road	318452	178805	Roadside	38.6	35.2	36.2	27.4	33.4	28	28.4	24.7	36.4	42.4	45.4	39	34.6	<b>27.0</b>	
CCC-130	96	Manor Way Junction	316601	179653	Roadside		32.5	29.5	35.5	32.2	24.4	25.6	24.5	27	32.8	40.8	36.6	31.0	<b>24.2</b>	
CCC-132	98	Western Avenue (premises)	314805	177345	Roadside	25.4	28.3	25.2	25.8	26.2	22.3	22.2	20.1	29.1	28.7	31.0	34.1	26.6	<b>20.8</b>	
CCC-133	99	Cardiff Road Llandaff	315275	178117	Roadside	30.6	40.5	34.2	34.8	31.7	25.1	25.7	20.6	37.8	31.9	37	36.3	32.2	<b>25.1</b>	
CCC-135	101	Cardiff AURN	318416	178525	Urban Centre	26.6	20.2	20	18.6	13.1	14.4							18.8	<b>14.1</b>	
CCC-138	102	Cardiff AURN	318416	178525	Urban Centre	23.7	22.2	17.6	18	13.1	13								17.9	<b>13.4</b>
CCC-137	103	Cardiff AURN	318416	178525	Urban Centre	26	19.1	20.2	18.3	11.9	13.2							18.1	<b>13.5</b>	
CCC-140	106	30 Caerphilly Road	316851	179520	Roadside	36.2	33.4	31.6	23.6	29.5	18.6	21.6	18	32.1	40.6	42.8	36.6	30.4	<b>23.7</b>	
CCC-146	112	17 Sloper Road	316613	175910	Roadside	31.1	36.2	26.8	29.2	27	23.5	21.6	25.6	35	30.1	39.7	29.4	29.6	<b>23.1</b>	
CCC-149	115	21 Llandaff Road	316604	176641	Roadside	34.1			30.1	34.5	25.9	29.9	23.9	21.7	42.6	46.7	38.5	32.8	<b>25.6</b>	
CCC-151	117	25 Cowbridge Road West	314458	176735	Roadside	46.3	53.1	43.4	48.2	42.5	36.3	37.6	36.3	60.5	45	49.2	48.1	45.5	<b>35.5</b>	
CCC-160	126	Westgate Street Flats	317946	176387	Roadside	30.1	24.3	28.7		30.3	26.1	28.4	27.1	35.1	35.4	40.7	34.2	30.9	<b>24.1</b>	
CCC-162	128	117 Tudor Street	317540	175979	Roadside	36.8	37.1	35.7	28	28.4	20.8	28.8	21.2	36.3	39.2	38.4	38.3	32.3	<b>25.2</b>	
CCC-165	131	Dragon Court	319292	176932	Roadside	38.9	34.9	37.1	34.8	37.9	6.9	29.8	34	36.7	36.6	48.4	34.8	34.2	<b>26.7</b>	
CCC-177	143	Windsor House	318009	176337	Roadside	36.2	25.6	29.8	27.8	27.2	27.5	31.7	29.9	41.1	38.7	43.9	35.5	32.9	<b>25.5</b>	
CCC-178	144	Marlborough House	318046	176307	Roadside			29.2	31	34.6	31.8	33	24.6	40.4	39.5		40.1	33.8	<b>26.4</b>	
CCC-181	147	211 Penarth Road	317636	175161	Roadside	35.5	32.6	31.2	35.5	29.3	23	22.3	22.9	33.7	31	36.2	30.2	30.5	<b>23.8</b>	
CCC-182	148	161 Clare Road	317695	175389	Roadside	30.6	35.3	31.9	36.5	28.3	24	28.4	23.2	33.5	28.6	37.5	30.4	30.7	<b>23.9</b>	
CCC-183	149	10 Corporation Road	317764	175174	Roadside	34.9	32	36.4	34.9	32.7	25.6	31.6	25.7	30.7	38.7	45.8	29.3	33.2	<b>25.9</b>	
CCC-190	156	2a/4 Colum Road	317997	177412	Roadside	25.6	27.3	26.5	25.8	25.2	19.9	19.5	20.9		26.8	34.1	21.4	25.7	<b>20.1</b>	
CCC-191	157	47 Birchgrove Road	316605	179703	Roadside	25.9	27	25.2	20	24.5	15.1	19.2	15	34.1	28.2	33.7	30.3	24.9	<b>19.4</b>	
CCC-192	158	64/66 Cathays Terrace	318093	177716	Roadside	30.4	30.1	28	24.4	24.2	20.7	19.8	17	30.2	28.3	36.5	32.9	26.9	<b>21.0</b>	
CCC-193	159	IMD facade replacement	320709	177918	Roadside	30.3	35.5	34.6	35.9	36.2	25.6	31.4	28.7	40.1	39.1	44.3	39.8	35.1	<b>27.4</b>	
CCC-200	166	163 Lansdowne Road	315950	176424	Roadside	40.6	38.7	27	32.4	37	29.5	33.3	15.2	34.5	40.5	43.3	38	34.2	<b>26.7</b>	
CCC-202	168	570 Cowbridge Road East	314856	176929	Roadside	30.9	30.6	28.4	29.6	25.7	24.4	25.2	24.8	32.9	28.1	36.8	31.7	29.1	<b>22.7</b>	
CCC-208	174	76 North Road	317508	177868	Kerbside	24.8	24.8	27	21.9	22.5	18.1	19.7	19.2	29.4	31.5	36.6	32.3	25.7	<b>20.0</b>	
CCC-213	179	Altouso, Bute Terrace	318627	176039	Roadside	56.4	31.6	47.9	48.3	41.2	45	47.1	42.8	53.4	48.8	60.2	55.9	48.2	<b>37.6</b>	
CCC-217	183	Station Terrace	318765	176623	Kerbside	36.5	27.9	28.7	28.9	28	20.4	23.8	26.1	37.4	32.1	38.4	36.9	30.4	<b>23.7</b>	
CCC-218	184	Hophouse, St Mary Street	318335	176074	Roadside	45.4	37.5	33.7	42.3	39.2				45.1				40.8	<b>27.5</b>	
CCC-220	186	Dempsey's Public House, Castle Street	318044	176449	Roadside	33.1				27.6	22.9	27	23.2	34				43.8	<b>30.2</b>	
CCC-221	187	Angel Hotel	317944	176436	Roadside	16.6	28.6	26.2		34	26.4	32	30.4	37.3	42.8	46.7	47.3	33.5	<b>26.1</b>	
CCC-222	188	Westgate Street (46 Apartments)	318229	176154	Roadside	47.3		38.2		39.8							43.4	40.3	<b>41.8</b>	
CCC-224	191	7 Mackintosh Place	318724	177776	Roadside	29.3	31.9	30.4	25.2	29.4	24	27.4	21.9	34	41.1	40.7	37.9	31.1	<b>24.3</b>	
CCC-227	194	115 Cowbridge Road West	313870	176212	Roadside	27.8	24.7	23.5	21.1	18.6	19.3	17.3	23.1	24.7	22.1	32.1	28.3	23.6	<b>18.4</b>	
CCC-228	195	244 Newport Road	320147	177523	Roadside	38.8	29.8	27.3	30	31	25.1	29.2	14.6	36.3	39.5	39.8	36.5	31.5	<b>24.6</b>	
CCC-229	196	2 Pencelose Road	316223	177305	Roadside	29.9	33.5	24.7	29.6	26.3	20.1	21.4	20.7	31.4	33.2	34.7	33.3	28.2	<b>22.0</b>	
CCC-231	198	New Building to Stephenson Court	319348	176958	Roadside	37.3	30.8	34	32.4	29.1	35.6	35.7	40.5	38.7	36.8	49.3	39.5	36.8	<b>28.7</b>	
CCC-232	199	157 Newport Road	319599	177174	Roadside	30.8	23.4	27.6	22	23.5	14.7	20.4	21.4	26.8	29.8	37	31.6	25.8	<b>20.1</b>	
CCC-233	200	350 Whitchurch Road	317038	179073	Roadside	42.1	33.5	33.8	34.8	29.2	30.7	27.8	28.8	36.3	38.3	48.7	38.4	35.2	<b>27.4</b>	
CCC-234	201	23 Lower Cathedral Road	317547	176411	Roadside	36.5		28.9	29.5	23.5	18.3		21.7	32.5	41.5	39.9	30.8	<b>24.0</b>		
CCC-235	202	22 Clare Street	317604	176053	Roadside	33.2	37.1	30.2	30.5	31.6	20.7	25.3	17.9	38.8	36.9	36.2	39	31.5	<b>24.5</b>	
CCC-236	203	10 Fair Oak Road	318255	178533	Roadside	20.8	24.8	22.4	19.8	19.9	16.7	18.1	15.5	23.4	25.9	29.7	26.5	21.9	<b>17.1</b>	
CCC-237	204	53 Neville Street	317487	176303	Roadside	32.9	28.8	24.6	23.9	21.2	15.6		16.8	28.2	29.6	32.5	29.7	25.8	<b>20.1</b>	
CCC-240	207	42 Waungron Road	314769	177343	Roadside	30.3	32	24.8	20	21.2	17	18.2	16.3	23.2	24.2	29.5	25.6	23.5	<b>18.3</b>	
CCC-241	208	2 Llantrisant Road	315152	178245	Roadside	28.4	30.2	24.9	24.4	24.2	19.9	21.7	16.2	28.6	34.4	33	29.4	26.3	<b>20.5</b>	
CCC-242	209	178 North Road	317200	178537	Roadside	23.5	21.5	20.7	20.6	17.4	13.3	16.8	15.3	24.3	25.4	30.5	25.9	21.3	<b>16.6</b>	
CCC-243	210	485 Caerphilly Road	316692	181088	Roadside	27	26.2	24	19.8	18.2	16.1	17.7	15.2	23.1	25.4	31.7	25.2	22.5	<b>17.5</b>	
CCC-244	211	19 Wall Wood Close, Penylan	320247	178903	Roadside	52		25.6	18.3	22.8	17.1	18.4	13.6	26.4	27.8	27.6	28.2	25.3	<b>19.7</b>	
CCC-245	212	Bridge Road	315197	178221	Kerbside	49.6	60.5	38	52.1	48.2	38.7	31.8		55.3	49.3	55.3	48.2	47.9	<b>37.4</b>	
CCC-267	214	Mitre Place	315254	178153	Roadside	36	39.5	31.9	32.5	36.1	24.1	28.8	15.1	36.4	38.1	37.9	34.9	32.6	<b>25.4</b>	
CCC-271	218	16-18 Cowbridge Road West	314471	176889	Roadside	42.2	40	37	43.5	38.7	36.5	36.2	32.7	42.7	42.3	52.5	41.2	40.5	<b>31.6</b>	
CCC-288	254	Giraffe Nursery Cathedral Road	317529	176340	Roadside	38.6	39.7	33.9	30.8	35.9	21.8	32	30.8		41.1	41.6	44.8	35.5	<b>27.7</b>	
CCC-273	220	Fitzalan Court Newport Road	318955	176823	Kerbside	49.5	35	37.6		38.9	35.7			49	44.2	46.2		42.0	<b>30.4</b>	
CCC-274	221	Student Flats (New student flats)	318530	177468	Kerbside	43.6	31.1	35.2	34.5			36.8	30.1					35.2	<b>26.9</b>	
CCC-273	190	3 Pearson Street	31366																	





# Appendix B: A Summary of Local Air Quality Management

## Purpose of an Annual Progress Report

This report fulfils the requirements of the Local Air Quality Management (LAQM) process as set out in the Environment Act 1995 and associated government guidance. The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas and to determine whether or not the air quality objectives are being achieved. Where exceedances occur, or are likely to occur, the local authority must then declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) within 18 months of declaration setting out the measures it intends to put in place in pursuit of the objectives. Action plans should then be reviewed and updated where necessary at least every five years.

For Local Authorities in Wales, an Annual Progress Report replaces all other formal reporting requirements and have a very clear purpose of updating the general public on air quality, including what ongoing actions are being taken locally to improve it if necessary.

## Air Quality Objectives

The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138), Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298), and are shown in **Error! Reference source not found..**

The table shows the objectives in units of microgrammes per cubic metre  $\mu\text{g}/\text{m}^3$  (milligrammes per cubic metre,  $\text{mg}/\text{m}^3$  for carbon monoxide) with the number of exceedances in each year that are permitted (where applicable).

**Table 15 - Air Quality Objectives Included in Regulations for the Purpose of LAQM in Wales**

<b>Pollutant</b>	<b>Air Quality Objective: Concentration</b>	<b>Air Quality Objective: Measured as</b>	<b>Date to be achieved by</b>
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	200µg/m <sup>3</sup> not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	40µg/m <sup>3</sup>	Annual mean	31.12.2005
<b>Particulate Matter (PM<sub>10</sub>)</b>	50µg/m <sup>3</sup> , not to be exceeded more than 35 times a year	24-hour mean	31.12.2010
<b>Particulate Matter (PM<sub>10</sub>)</b>	40µg/m <sup>3</sup>	Annual mean	31.12.2010
<b>Sulphur dioxide (SO<sub>2</sub>)</b>	350µg/m <sup>3</sup> , not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
<b>Sulphur dioxide (SO<sub>2</sub>)</b>	125µg/m <sup>3</sup> , not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
<b>Sulphur dioxide (SO<sub>2</sub>)</b>	266µg/m <sup>3</sup> , not to be exceeded more than 35 times a year	15-minute mean	31.12.2005
<b>Benzene</b>	16.25µg/m <sup>3</sup>	Running annual mean	31.12.2003
<b>Benzene</b>	5µg/m <sup>3</sup>	Annual mean	31 12 2010
<b>1,3 Butadiene</b>	2.25µg/m <sup>3</sup>	Running annual mean	31.12.2003
<b>Carbon Monoxide</b>	10.0mg/m <sup>3</sup>	Maximum Daily Running 8-Hour mean	31.12.2003
<b>Lead</b>	0.25µg/m <sup>3</sup>	Annual Mean	31.12.2008

# Appendix C: Air Quality Monitoring Data QA/QC

## QA/QC of Diffusion Tube Monitoring

### Diffusion Tube Bias Adjustment Factors

A database of bias adjustment factors determined from Local Authority co-location studies throughout the UK has been collated by the LAQM Helpdesk. The National Diffusion Tube Bias Adjustment Factor Spreadsheet (Version 06/21) was used to obtain an overall adjustment factor of 0.78 from the input data shown in the following screenshot. This overall factor is based on 24 co-location studies where the tube preparation method and analysis laboratory used were the same as those used by CC.

National Diffusion Tube Bias Adjustment Factor Spreadsheet						Spreadsheet Version Number: 06/21				
Follow the steps below in the correct order to show the results of relevant co-location studies								This spreadsheet will be updated at the end of Sept 2021		
Data only apply to tubes exposed monthly and are not suitable for correcting individual short-term monitoring periods										
Whenever presenting adjusted data, you should state the adjustment factor used and the version of the spreadsheet										
This spreadsheet will be updated every few months: the factors may therefore be subject to change. This should not discourage their immediate use.								LAQM Helpdesk Version		
The LAQM Helpdesk is operated on behalf of Defra and the Devolved Administrations by Bureau Veritas, in conjunction with contract partners AECOM and the National Physical Laboratory.						Spreadsheet maintained by the National Physical Laboratory. Original compiled by Air Quality Consultants Ltd.				
Step 1:	Step 2:	Step 3:	Step 4:							
Select the Laboratory that Analyses Your Tubes from the Drop-Down List	Select a Preparation Method from the Drop-Down List	Select a Year from the Drop-Down List	Where there is only one study for a chosen combination, you should use the adjustment factor shown with caution. Where there is more than one study, use the overall factor shown in blue at the foot of the final column.							
If a laboratory is not shown, we have no data for this laboratory.			If you have your own co-location study then see footnote <sup>1</sup> . If uncertain what to do then contact the Local Air Quality Management Helpdesk at LAQMHelpdesk@bureauveritas.com or 0800 0327953							
Analysed By <sup>1</sup>	Method	Year	Site Type	Local Authority	Length of Study (months)	Diffusion Tube Mean Conc. (Dm) (µg/m <sup>3</sup> )	Automatic Monitor Mean Conc. (Cm) (µg/m <sup>3</sup> )	Bias (B)	Tube Precision <sup>1</sup>	Bias Adjustment Factor (A) (Cm/Dm)
SOCOTEC Didcot	50% TEA in acetone	2020	R	East Suffolk Council	12	30	25	19.6%	G	0.84
SOCOTEC Didcot	50% TEA in acetone	2020	UB	Canterbury City Council	10	13	10	28.1%	G	0.78
SOCOTEC Didcot	50% TEA in acetone	2020	R	Canterbury City Council	9	26	20	29.6%	G	0.77
SOCOTEC Didcot	50% TEA in acetone	2020	UB	Kingston upon Hull City Council	12	24	18	34.8%	G	0.74
SOCOTEC Didcot	50% TEA in acetone	2020	R	Ipswich Borough Council	12	27	21	28.5%	G	0.78
SOCOTEC Didcot	50% TEA in acetone	2020	R	Ipswich Borough Council	12	36	26	36.3%	G	0.73
SOCOTEC Didcot	50% TEA in acetone	2020	R	Thanet District Council	9	20	17	21.2%	G	0.83
SOCOTEC Didcot	50% TEA in acetone	2020	R	Medway Council	12	26	18	41.7%	G	0.71
SOCOTEC Didcot	50% TEA in acetone	2020	B	Medway Council	11	20	10	96.3%	G	0.51
SOCOTEC Didcot	50% TEA in acetone	2020	B	Gravesham Borough Council	12	23	22	5.6%	G	0.95
SOCOTEC Didcot	50% TEA in acetone	2020	B	Gravesham Borough Council	12	27	24	16.1%	G	0.86
SOCOTEC Didcot	50% TEA in acetone	2020	R	Monmouthshire County Council	10	32	24	35.3%	G	0.74
SOCOTEC Didcot	50% TEA in acetone	2020	LI	North Lincolnshire Council	13	18	14	26.6%	G	0.79
SOCOTEC Didcot	50% TEA in acetone	2020	R	City of York Council	12	24	19	29.0%	G	0.78
SOCOTEC Didcot	50% TEA in acetone	2020	R	City of York Council	11	22	17	34.3%	G	0.74
SOCOTEC Didcot	50% TEA in acetone	2020	R	City of York Council	12	33	23	40.4%	G	0.71
SOCOTEC Didcot	50% TEA in acetone	2020	R	Cambridge City Council	10	30	20	47.6%	G	0.68
SOCOTEC Didcot	50% TEA in acetone	2020	R	Wrexham County Borough Council	9	17	13	26.6%	G	0.79
SOCOTEC Didcot	50% TEA in acetone	2020	KS	Marylebone Road Intercomparison	11	59	43	38.0%	G	0.72
Socotec Didcot	50% TEA in acetone	2020	R	Horsham District Council	10	23	23	2.2%	G	0.98
Socotec Didcot	50% TEA in acetone	2020	R	Horsham District Council	12	22	19	18.6%	G	0.84
Socotec Didcot	50% TEA in acetone	2020	R	Horsham District Council	9	25	18	42.0%	G	0.70
Socotec Didcot	50% TEA in acetone	2020	R	Dacorum Borough Council	10	24	19	25.2%	G	0.80
Socotec Didcot	50% TEA in acetone	2020	R	Huntingdonshire District Council	12	36	25	47.1%	G	0.68
SOCOTEC Didcot	50% TEA in acetone	2020		<b>Overall Factor<sup>2</sup> (24 studies)</b>				<b>Use</b>		<b>0.76</b>

## Discussion of Choice of Factor to use

The bias adjustment factor applied to all 2021 data is 0.78. The applied bias adjustment factor has been calculated using the national diffusion tube bias adjustment factor spreadsheet version 03/22.

## QA/QC of Diffusion Tube Monitoring

The diffusion tubes are supplied and analysed by Socotec UK Ltd Didcot, using the 50% triethanolamine (TEA) in water method. Socotec UK Ltd Didcot participates in the Annual Field Inter-Comparison Exercise and Workplace Analysis Scheme for Proficiency (WASP) inter-comparison scheme for nitrogen dioxide diffusion tube analysis. From April 2014 the WASP Scheme was combined with the STACKS scheme to form the new AIR scheme, which Socotec UK Ltd Didcot participates in. The AIR scheme is an independent analytical proficiency testing scheme operated by LGC Standards and supported by the Health and Safety Laboratory (HSL).

**The laboratory Socotec UK Ltd Didcot is regarded ranked as the highest rank of satisfactory in relation to the WASP intercomparison scheme for spiked nitrogen dioxide diffusion tubes. Information regarding tube precision can be obtained via <http://laqm.defra.gov.uk/diffusion-tubes/precision.html> Information regarding WASP results can be obtained via <http://laqm.defra.gov.uk/diffusion-tubes/qa-qc-framework.html>**

**Table 16 - Bias Adjustment Factor**

Year	Local or National	National Reference	Adjustment Factor
2021	National	03/22	0.78
2020	National	09/20	0.76
2019	National	06/19	0.75

## NO<sub>2</sub> Fall-off with Distance from the Road

No diffusion tube NO<sub>2</sub> monitoring locations within the Vale of Glamorgan required distance correction during 2021.

## PM<sub>10</sub> and PM<sub>2.5</sub> Monitoring Adjustment

The PM monitors at the Cardiff AURN sites and the Castle Street automatic monitor use Beta Attenuation Monitor (BAM) with gravimetric equivalence. Therefore, to present the data as gravimetric equivalence, a conversion factor of 0.83 has been applied, using the European Standards.

### Automatic Monitoring Annualisation

There are no automatic monitoring locations that required annualization during 2021.

### NO<sub>2</sub> Fall-off with Distance from the Road

No automatic NO<sub>2</sub> monitoring locations within the Cardiff area required distance correction during 2021.

**Table 17 - Annualisation Summary (concentrations presented in µg/m<sup>3</sup>)**

Diffusion Tube ID	Annualisation Factor Cardiff City Centre AURN	Annualisation Factor St Julians School, Newport	Average Annualisation Factor
101	0.9350	0.9821	0.9585
102	0.9350	0.9821	0.9585
103	0.9350	0.9821	0.9585
184	0.8333	0.8939	0.8636
186	1.0234	1.0586	1.0410
188	0.7853	0.8612	0.8233
220	0.9008	0.9537	0.9272
221	0.9465	1.0133	0.9799
TRO-001	0.8332	0.9100	0.8716
TRO-020	0.8782	0.9491	0.9136
TRO-036	0.9907	1.0541	1.0224
TRO-014	1.0473	1.0806	1.0640

## Appendix D: AQMA Boundary Maps

Figure 31 - Cardiff City Centre AQMA



Figure 32 - Stephenson Court AQMA





Figure 33 - Ely Bridge AQMA



**Figure 34 - Llandaff AQMA**



## Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the LA intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
APR	Air quality Annual Progress Report
AURN	Automatic Urban and Rural Network (UK air quality monitoring network)
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by Highways England
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
PM <sub>10</sub>	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM <sub>2.5</sub>	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO <sub>2</sub>	Sulphur Dioxide

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SUBORDINATE  
LEGISLATION

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**WG22-38**

**ENVIRONMENT ACT 1995**

Environment Act 1995 (Activity to  
ensure Nitrogen Dioxide  
Compliance) Air Quality Direction  
2022

**EXPLANATORY NOTE**

*(This note is not part of the Direction)*

This direction directs Cardiff Council to carry out the specified activities listed in the Schedule by the specified deadlines, in relation to its duties in respect of Air Quality under Part 4 of the Environment Act 1995 and as part of the UK plan for tackling roadside nitrogen dioxide concentrations 2017. Under section 85(7) of that Act it is the duty of Cardiff Council to comply with a direction given to it. A copy of this direction is available from the Welsh Government, Cathays Park, Cardiff, CF10 3NQ.

**WG No. 22-38**

**ENVIRONMENT ACT 1995**

Environment Act 1995 (Activity to  
ensure Nitrogen Dioxide  
Compliance) Air Quality Direction  
2022

*Made* 20 September 2022

*Coming into force* 21 September 2022

The Welsh Ministers, in exercise of the power conferred by section 85(5) of the Environment Act 1995(1) give the following direction.

In accordance with section 85(6) a copy of this direction will be published in the London Gazette.

The Welsh Ministers make this direction having determined that the steps specified in this direction are appropriate in order to secure the meeting of the retained EU obligations under the Air Quality Standards (Wales) Regulations 2010(2).

**Title, commencement and application**

**1.**—(1) The title of this direction is the Environment Act 1995 (Activity to ensure Nitrogen Dioxide Compliance) Air Quality Direction 2022.

(2) This direction comes into force on 21 September 2022.

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(1) 1995 c. 25. The functions of the Secretary of State under section 85(5) were transferred to the National Assembly for Wales in relation to Wales by article 2 of, and Schedule 1, to the National Assembly for Wales (Transfer of Functions) Order 1999 (S.I. 1999/672). By virtue of section 162 of, and paragraph 30 of Schedule 11 to, the Government of Wales Act 2006 (c. 32), the functions conferred on the Assembly are now exercisable by the Welsh Ministers. Section 85(5)(a) Environment Act 1995 was amended by regulation 3(7) of the Environment (Amendment etc.) (EU Exit) Regulations 2019 (S.I. 2019/458).

(2) SI 2010/1433 W.126.

(3) This direction applies to Cardiff Council.

**Interpretation**

2. In this direction—

“specified authority” means Cardiff Council;

“specified activities” means the activities described in the Schedule.

**Requirement to take certain steps**

3. The specified authority must complete the specified activities by the dates specified in the Schedule.

*Julie James*

Minister for Climate Change, one of the Welsh Ministers

20 September 2022

## SCHEDULE Articles 2 and 3

### Specified Activities

<i>Activity</i>	<i>Description of activity</i>	<i>Deadlines</i>
<p><b>Implementation of permanent variation of preferred option for Castle Street identified in <i>Cardiff Council Clean Air Feasibility Study Revised Final Plan – October 2019</i> as City Centre North (CCN).</b></p>	<p><b>Delivery of City Centre North (CCN) Scheme:</b></p> <ul style="list-style-type: none"> <li>• Reduction of highway space.</li> <li>• Installation of two-way dedicated cycleway along the length of Castle Street.</li> </ul>	<p><b>To be delivered without delay and according to the agreed implementation timetable.</b></p>
<p><b>Should Cardiff Council prefer to review options for a permanent scheme for Castle Street to deliver an equal, or greater, level of ambition - undertake, as part of the UK plan for tackling roadside nitrogen dioxide concentrations 2017, a feasibility study in accordance with the HM Treasury's Green Book approach, to identify the alternative option which will ensure sustained, long-term compliance with legal limits for nitrogen dioxide, in the shortest possible time.</b></p>	<p><b>Initial scoping proposals:</b> Setting out the proposed approach to the feasibility study and including scope of work, governance, resourcing, procurement approach, indicative costs and timings.</p>	<p><b>As soon as possible and by 30 September 2022 at the latest.</b></p>
<p><b>As above.</b></p>	<p><b>Initial Plan:</b> Setting out the case for change and identifying, exploring, analysing, and developing options for measures which the local authority will implement to ensure sustained, long-term compliance in the shortest possible time, with indicative costs for those options.</p>	<p><b>As soon as possible and by 28 November 2022 at the latest.</b></p>



As above.	<p><b>Final Plan:</b>  Identifying in detail the preferred (permanent scheme) option for delivering compliance in the shortest possible time and including a full business case setting out value for money considerations and implementation arrangements and timings.</p>	<p><b>As soon as possible and by 31 January 2023 at the latest.</b></p>
<p><b>Whilst delivering the specified activities, maintain legal compliance with NO<sub>2</sub> limits at Castle Street.</b></p>	<p><b>Monitoring plan:</b>  Including timings/trigger points, and specific actions to be taken, to ensure concentrations on Castle Street remain compliant.</p>	<p><b>As soon as possible and by 30 September 2022 at the latest.</b></p>

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**CABINET MEETING: 15 DECEMBER 2022**

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**ST DAVID'S HALL****CULTURE, PARKS & EVENTS (COUNCILLOR JEN BURKE-DAVIES)****AGENDA ITEM: 5**

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**Appendices 1-7 of this report are not for publication as they contain exempt information of the description contained in paragraphs 14 and 16 of Part 4 of Schedule 12A of the Local Government Act 1972. In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.**

**Reason for this Report**

1. To consider options for the future operation of St David's Hall following an offer made by Academy Music Group ("AMG") to secure investment in the building and to protect the long-term delivery of the classical music programme.

**Background**

2. St David's Hall opened in September 1982 as the National Concert Hall and Convention Centre for Wales. The building is located in the Hayes in Cardiff city centre and can accommodate 2,000 people in the main auditorium, making it the city's second biggest venue outside of sporting stadia, and the largest venue dedicated to the arts. The venue was established to deliver a wide range of events and performances, including symphonic orchestral performances in a purposely designed setting, rock and pop, comedy, dance and conferences.
3. The building is owned, operated and funded by Cardiff Council and was developed by Seymour Harris Partnership with contractors John Laing & Son to provide a superlative performing arts and conference venue befitting the capital city of Wales. To that end, significant effort was undertaken to ensure that the building was appropriate for international classical music performances, working with renowned acousticians Sandy Brown to create the perfect conditions for audiences to enjoy a full symphony orchestra. As a result of this work St David's Hall has become world renowned for the acoustic quality of the hall, recognised as being amongst the top ten of the world's best

sounding concert halls and one the UK's highest-ranking classical music venues.

4. The Council works with promoters and partners such as the BBC National Orchestra of Wales, Welsh National Opera and the Royal Welsh College of Music and Drama in developing a classical programme which has evolved over the past four decades. The venue also presents youth orchestras and community activities. St David's Hall has programmed world class artists as diverse as Andres Segovia, Rudolf Nureyev, Bryn Terfel, Rebecca Evans, Shirley Bassey, Dionne Warwick, Tom Jones, Blondie, U2, Metallica, Manic Street Preachers and Little Simz to perform since its inception.
5. The venue continues to deliver a wide range of events, complimenting existing and new venues across the city such as the Wales Millennium Centre. This includes high profile events such as the BBC Cardiff Singer of the World competition, which is due to celebrate its 40<sup>th</sup> anniversary, the world class International Concert Series, and the Welsh Proms. The BBC National Orchestra of Wales has been the resident symphony orchestra for the venue since its opening and regularly broadcasts live on BBC Radio 3. As such the auditorium is an integral part of the city's cultural landscape.

#### Current Usage

6. The classical music programme consists of approximately 70 days including get-in set-up, get-out and rehearsal days. The main series consists of 16-18 concerts including 7 concerts delivered by the BBC National Orchestra of Wales; 2 by the orchestra of the Wales National Opera; and 7 concerts from traveling orchestras that make up the "International Series". This is supplemented by a range of additional classical performances and community events, including the Welsh Proms, performances by the National Youth Orchestra of Wales, Cardiff Philharmonic, the Royal Welsh College of Music and Drama, Cardiff University and numerous county music services and schools, youth and community orchestras and the Wales Festival of Remembrance. In addition, the Arts Active Trust utilises 3 days each year for performances in the main auditorium taking the total to 73 days. Bi-annually the Cardiff Singer of the World competition requires an additional 14 days, taking the total to 87 days (from 73 days) every other year.
7. The funding model for classical performances varies, for example, the BBC National Orchestra of Wales pays a hire fee for the hall retaining ticket income whilst Welsh National Opera perform for a box office split. The seven international orchestras booked by St David's Hall for the International Series range from top UK orchestras to renowned European orchestras. These orchestras often require a large upfront financial guarantee, ranging from £25,000 to £42,000 per single performance with the Council taking a risk on recouping these costs through retaining a proportion of ticket sales.
8. St David's Hall also hosts rock, pop, jazz, folk, comedy, lunchtime concerts and choir performance to generate income to offset against the costs of the classical and community programmes. As part of this, St David's Hall also often programmes tribute acts and even though these are often popular and well

attended, the public regularly comments that they wish more current and high-profile music acts would perform more regularly at St David's Hall.

9. Overall, in 2019-20 there were 310 performances and there will be a similar number this year.

#### Arts Active Trust

10. The Arts Active Trust is a registered independent charity operating out of St David's Hall. The Trust aims to attract funding from external sources such as the Arts Council for Wales to facilitate and implement an outreach programme to promote the activities of St David's Hall, the New Theatre and other partners, to engage with communities in Cardiff and beyond; to encourage interest in and appreciation of music, performing arts and multidisciplinary arts projects through participation, education and audience development. The work of the Trust is carried out by three full time staff employed by St David's Hall.
11. In the current financial year, Arts Active Trust has secured c£300k of funding from various sources for their outreach work in support of the classical programme. This sum includes funding from the Arts Council of Wales from a National Lottery programme which is applied for each year (normally circa £99k per annum). In 2022/23, around 40% of this Arts Council funding was allocated towards the direct up-front costs of attracting international orchestras, and 60% supported engagement and outreach activities connected to the classical series, such as pre-concert talks, young composers scheme, schools' composition projects and podcasts.
12. The Arts Active Trust use 3 days for performances/events in the main auditorium, supplemented by an extensive programme on Level 1 and other areas for the Gamelan, Soundworks, workshops, performances and events.

#### Council Policy

13. St David's Hall plays a significant role in the city's wider economic and cultural agenda, notably as part of Cardiff's Music City ambitions. Subsequently, the Council's Corporate Plan 2022-25 includes a commitment to "*considering development and investment opportunities for St David's Hall to retain its position as a world-class auditorium.*" This is in response to a recommendation from the 'Sound Diplomacy' report to "*ensure St David's Hall maintains its reputation as a world-class concert venue*".
14. Stronger, Fairer, Greener - the administration's five-year strategy for Cardiff - also includes a commitment to "*ensure St David's Hall retains its position as a world-class auditorium*".
15. In 2019, prior to the pandemic, Cabinet considered the *Securing the Future of Cardiff's Heritage Buildings* report, that outlined the Council's need to secure a future for the city's most important heritage and cultural assets, including St David's Hall. The report indicated that due to impending significant maintenance liabilities and high operating costs, the Council faced increasing capital and revenue implications relating to the continued operation of St David's Hall. The report also outlined that significant investment is required to

ensure St David's Hall remained safe to use and of sufficient quality to adequately meet service requirements. The Heritage Buildings report subsequently provided authority for officers to develop a modernisation proposal and to present options back to Cabinet.

## Issues

16. Whilst St David's Hall remains a renowned classical music venue, it is slowly falling into a state of disrepair which threatens to undermine its reputation and on-going operation. The lack of national funding to support the venue has meant the burden of responsibility for maintaining the building and delivering the classical programme has fallen on the Council. The Arts Council of Wales withdrew the venue's *Revenue Funded Organization* status in 2014 which provided c£65k per annum over approved 5-year periods. Although the scale of this contribution was relatively modest, it did nonetheless represent a gesture of support for a facility of 'national' significance. The Arts Council for Wales does still provide ad-hoc funding towards the classical series of £99k per annum, through Arts Active, however this funding is required to be applied for each year.
17. Despite the Council's sustained and significant financial contribution towards the venue (over an extended period of 40 years) the operational budget has not been sufficient to both protect the delivery of the classical programme and to release investment to maintain and modernize the building. The Council has only been able to afford to implement a basic maintenance programme to cover general wear and tear amounting to circa £2m of capital and circa £600k of revenue over the last 10 years. This has become increasingly insufficient as the building has grown older.
18. In 2021, the Council procured a detailed condition survey of St David's Hall following the identification of several issues, primarily with the roof. The condition survey sets out a detailed schedule of priority works relating to the fabric of the building and the mechanical and electrical equipment together with associated indicative costs of repair. The condition survey was presented to Cabinet in December 2021 as part of the Corporate Property Strategy 2021-26 and is attached at Confidential Appendix 1, supported by a cost report at Confidential Appendix 2. As Cabinet will note, the cost of essential works, consequential improvements, addressing the maintenance backlog and the general modernisation of the building has an overall financial implication which stretches into the tens of millions. These costs are likely to have increased since the condition survey was drafted in 2021 due to inflationary pressures.
19. Health and safety requirements associated with these priority works has escalated over recent months. The condition survey uncovered that the ceiling at St David's Hall is formed of Reinforced Autoclaved Aerated Concrete (RAAC) planks. This led the Council to implement a building management and health and safety strategy (set out at Confidential Appendix 3) based on professional advice and government bulletins, to ensure St David's Hall could continue to operate safely over the short term. However, in recent months government guidance on the risk associated with RAAC planks has been updated and has escalated the need for remedial works as set out in Confidential Appendix 3. The current management approach can only

reasonably be continued over the short term as a stop gap to permanent remediation.

20. The scale of capital investment required to address both the short-term repairs, the longer-term maintenance backlog, and general modernisation to ensure a good quality provision consistent with industry standards, is not available from within existing Council resources and any borrowing to fund the works would have a significant additional revenue implication on the Council at a time when many services are facing significant cuts.
21. The allocated revenue subsidy from the Council for St David's Hall is £688,700 in the current year. However, the venue regularly achieves lower box office revenue than forecast and as such the actual level of Council financial support regularly exceeds £1m per annum. The unallocated budget spend is required to be absorbed within wider directorate budgets and each year this is becoming increasingly difficult to achieve due to the growing pressure on Council budgets. This problem will be magnified significantly in the next financial year as the Council is forecasting a revenue budget shortfall of circa £53m.
22. For nearly a decade, since the onset of public sector austerity, the Council has been keen to identify ways to reduce the burden of St David's Hall on the public purse. In 2016, the Council undertook a full OJEU Competitive Dialogue public procurement process to identify an external operator for both St David's Hall and the New Theatre, which at the time were managed as one combined entity. Although the process generated interest from the market, it was clear that the interest was contingent on the Council retaining full responsibility for the maintenance of St David's Hall. There was strong interest in the New Theatre as a separate going concern and in 2019 the Council separated the operation of the two venues and proceeded with a strategy which secured an external operator for the New Theatre only, through a property lease.
23. The level of subsidy of the classical programme has had a consequential knock-on effect on the level of investment the Council has been able to make towards the maintenance and modernisation of the building. As the building has grown older, the maintenance backlog has grown more significant, with the Council only able to support general day to day repairs. In December 2021, following the update to Cabinet on the condition of the building, Cabinet requested the development of an Outline Business Case for St David's Hall that would consider the options for dealing with the implications of the condition survey and seek to remove or at least reduce the operational subsidy. The Outline Business Case is attached at Confidential Appendix 4.
24. The Council has received an unsolicited offer from AMG to take over the operation of St David's Hall without subsidy and to take away all of the building's risks and liabilities from the Council. The details of AMG's offer are set out later in this report. Given the emerging pressure on resources, and the growing Health and Safety requirements for the venue, the Council has considered the offer as a means of securing much needed investment into the building. The Council's consideration of the offer has been on the clear basis of a firm commitment from AMG to work to enhance the venue's reputation as the National Concert Hall of Wales (alongside the introduction of their Academy music venue) by continuing to maintain and develop the classical

music programme, Their proposal would protect the Classical Series including the events delivered by the BBC National Orchestra of Wales, the orchestra of the Welsh National Opera, the Royal Welsh College of Music and Drama and the International Series.

25. The timing of AMG's offer enabled external consultants to consider the proposition as part of an Outline Business Case. The work involved engagement with external parties in 2022 to gauge current market interest and in particular to determine if anything fundamental had changed since the public procurement process undertaken in 2016. The consultants also engaged with the main users of the venue to test the offer from AMG, to ensure that adequate provisions had been made to protect the classical programme. Engagement with these organisations was positive and productive.

### **Outline Business Case**

26. Whilst the Council has been open to consideration of alternative operating models for St David's Hall since 2014, it has always been centered around a number of minimum requirements. Firstly, the Council has always wanted to retain the freehold ownership of the property and would only consider leasehold arrangements. The Council has been open to interest from parties prepared to protect the classical and community programme, ideally without any subsidy being provided by the Council, and at the same time securing an arrangement which would result in a commitment to investing in the building and taking the building liability away from the Council. The public procurement process undertaken in 2016 did not identify a party that matched the Council's aspirations or key requirements. Bidders required the building liabilities to remain with the Council. Since then, the building has deteriorated further as it has grown older, and the pandemic has made the business model even more difficult to succeed. Despite this, the Council has received an unsolicited offer from AMG setting out a proposal to continue to operate St David's Hall by way of a property lease. The offer includes taking full responsibility for the liability of the building, protecting the classical and community programme, protecting the acoustic value of the auditorium and securing existing jobs. The offer is attached as part of Confidential Appendix 4 and is detailed at Confidential Appendix 5.
27. The Council has appointed specialist consultants to consider an Outline Business Case based on the following options:
  - a. Option 1 (Council Retained) – consider whether there are opportunities through a continued in-house operational model to mitigate the current operational subsidy and to address the immediate health and safety risks and the longer-term maintenance backlog and modernisation investment required.
  - b. Option 2 (AMG Offer) – consider the value and benefit of the offer made by AMG.
  - c. Option 3 (The Market) – consider the appropriateness and viability of undertaking a public procurement exercise to establish whether the wider market would be able to provide improved value.



28. The Outline Business Case is attached at Confidential Appendix 4. The offer from AMG is considered the preferred option. The option for the Council to retain the building would leave the building liability with the Council and would still require an on-going revenue subsidy, albeit this could potentially be reduced over time. The market engagement work in 2022 (relating to Option 3) confirmed that little had changed since the public procurement process undertaken in 2016 meaning that the building liability would need to remain with the Council, and that the offer from AMG was based on a unique set of circumstances and was unlikely to be matched.

### **The AMG Offer (Option 2)**

29. The AMG offer is set out in detail at Confidential Appendix 5. The offer includes:

- A commitment to take on full responsibility for the building, taking the liability away from the Council and removing the need for the Council to provide any ongoing subsidy towards the up-keep and operation of the building.
- Allowing AMG, as tenant, to operate the venue as an independent commercial enterprise. This would allow AMG to have discretion over programming and ticket, including the pricing of classical events where AMG provides an up-front guarantee to attract travelling orchestras.
- A commitment to fully retain and provide a long-term future to the National Concert Hall of Wales whilst optimising the overall event calendar, including:
  - A commitment to allocate a minimum of 60 days within the peak event calendar to accommodate key classical events. These dates would be secured annually in the event calendar over the full term of the lease. The 60 days offer is not intended to limit the number of days, but rather is a commitment to set aside an appropriate number of high quality (peak-time) days to the classical programme that can be committed to up to 12 months in advance (or earlier as required).
  - A commitment to accommodate the remainder of the classical and community programme around the commercial event calendar including in the peak period if dates are available up to 3 months in advance. Where possible these events would be accommodated on days when the venue is already scheduled to be opened for an event. Where this is not possible and the venue is required to open specifically for an event when it would otherwise be closed, a 'community rate' would be chargeable, equivalent to the cost of operating the venue. Most events, including community events, are already subject to fees from St David's Hall. As part of this the Council is considering establishing a small fund that can be applied to on an exceptions basis by community organisations that are not able to pay the community rate. The community rate card would be agreed by the Council prior to completion of any lease.

- A commitment to continue to work with the Arts Active Trust by providing continued access to the venue. The St David's Hall staff currently employed to deliver the Arts Active programme will remain employed by the Council.
- A commitment to continue to utilise the expertise of an independent classical music programme advisor;
- A commitment to maintain the venue's key musical instruments including the 5 Steinway pianos and the St David's Hall organ;
- A commitment to enter into a User Agreement with the key classical and community stakeholders to develop an optimum classical and community programme, with the Council providing a dispute resolution role.
- A commitment to employing existing Council staff on existing terms and conditions through a TUPE agreement and in full compliance with the Code of Practice;
- A commitment to invest in a series of repairs to address the current Health & Safety requirements to ensure the building can be kept open for use.
- In addition, AMG has outlined to the Council investment plans for the building, which include:
  - Investment in the communal areas of the building (foyers / bars etc.) to modernise the building.
  - Investment in the stage area to enable more flexible and up to date use.
  - Investment in the main auditorium to improve the experiential offer including a range of cosmetic improvements such as new seat coverings, flooring etc without affecting the integrity of the auditorium and/or its acoustic quality.
  - Investment in the lower stalls area to allow for the installation of removable seating to enable standing for a wide range of music events. This proposal has been tested and approved by the original acoustic engineers Sandy Brown to confirm no noticeable impact on acoustic quality.
  - A commitment to utilising an independent acoustic engineer (to be approved by the Council) to review any modifications that could affect the acoustic quality of the auditorium before proceeding with works.
  - Delivering the AMG Academy music product to Cardiff bringing a significant number of high-quality rock and pop music events to Cardiff each year. This will provide the residents of Cardiff and the wider region with access to up-and-coming rock and pop artists which at present they

need to travel to the nearest Academy venues in Bristol, London or Birmingham to experience.

30. AMG operates 21 venues across the UK and this includes a track record of operating important heritage buildings, including the Shepherds Bush Empire, the Leeds Coliseum (a Grade I listed gothic-style building opened as the Coliseum concert hall in 1885) and City Hall Newcastle, amongst others. AMG also has experience of managing venues such as the O2 Guildhall Southampton that provide a varied calendar including a significant programme of classical and community events.
31. A high-level comparison of the cost to the Council for both Option 1 and Option 2 are set out in Confidential Appendix 7 and can be summarized as follows:
  - a. Option 1 - assumes Council capital investment into property repair and refurbishment in line with professional advice and continuation of the £688,700 annual budget subsidy over a 40-year period.
  - b. Option 2 – AMG offer requiring no Council capital investment and no annual revenue subsidy. This option offers the Council an equivalent saving compared to Option 1 of £133m over a 40-year capital repayment programme (see Confidential Appendix 7 for details).
32. This report recommends proceeding with Option 2 as the most sustainable and affordable solution to protect St David’s Hall, its classical programme, and the venue’s staff.

### **Market Considerations**

33. In 2016, the Council undertook a full OJEU public procurement process to seek an operator for both St David’s Hall and the New Theatre. The procurement involved an extensive Competitive Dialogue process which lasted 18 months to complete at significant cost to the Council. The process was not successful in securing a suitable outcome for either venue. In terms of St David’s Hall, the Council was unable to secure a commitment from a commercial operator to invest the necessary resources to improve the fabric of the building whilst at the same time eliminating or significantly reducing the subsidy from the Council for the continuation of the classical programme. (A position that has been reconfirmed in recent work on the Outline Business Case).
34. Following the feedback received through the Competitive Dialogue process, in 2019, the Council took the New Theatre back out to the market, in isolation from St David’s Hall, and secured an external operator through a property lease rather than a service contract.
35. In 2021, the Council received an unsolicited offer from AMG to operate St David’s Hall without subsidy, whilst protecting the classical programme and accepting full responsibility for the liability of the building and its on-going maintenance. AMG’s offer therefore meets the Council’s minimum requirements when it took the opportunity to the market in 2016, that is,

eliminating the operating subsidy, protecting the classical programme, and committing to remove the building liabilities from the Council.

36. The Council's appointed consultants undertook an element of market testing as part of their work to develop the Outline Business Case. The focus of this work was to determine if the market's appetite for operating the building without subsidy and taking on full responsibility for the building had changed since 2016. They confirmed that any transfer would still require the Council to retain responsibility for the building at the very least.
37. The AMG offer is different and is based on a unique set of circumstances. The proposal would provide AMG with an opportunity to secure a presence in Cardiff city centre in advance of the closure of the Cardiff International Arena that is scheduled to close once the new Indoor Arena is delivered in Cardiff Bay. It would also provide a smaller venue to develop a pipeline of talent in the local marketplace that can be showcased in the new Indoor Arena in the future.
38. If, following the public consultation exercise that will be undertaken as part of the Council's budget setting process, the Council is minded to proceed with AMG's offer, the Council intends to publish a Voluntary Ex-Ante Transparency Notice ("VEAT Notice"). The purpose of the VEAT Notice is to provide transparency to the market of the intention to enter into the proposed contractual arrangements on the basis that it is a land transaction which is exempt from the procurement rules. In doing so the Council will observe a standstill period prior to entering into the contractual arrangements with AMG.
39. Legal advice regarding the proposed transaction is set out at Confidential Appendix 6.

### **Scrutiny Consideration**

40. The Economy & Culture Scrutiny Committee is due to consider this report. Any comments received will be circulated at the Cabinet meeting.

### **Reasons for Recommendation**

41. To establish a sustainable long-term future for the National Concert Hall of Wales and to protect the delivery of the classical music programme.

### **Financial Implications**

42. The report recommends approval in principle for the Council to enter into a long-term property lease with AMG as tenant for the operation of St David's Hall and as an independent commercial enterprise. Any final decision would be subject to the public consultation process to be undertaken as part of the Council's budget setting process for 2023/24 and the proposed publication of a VEAT notice.
43. It is proposed that a further report be brought to a future meeting of Cabinet for consideration and approval of a final lease agreement. The proposal will be subject to completion of the detailed Heads of Terms to include final detail

of the transfer of building liabilities and the transfer of relevant staff under TUPE regulations.

44. Subject to the final detail, the proposal is aimed at the removal of the ongoing operating subsidy to the Council with a current annual revenue budget set at £688,700.
45. A detailed condition survey carried out in 2021 is noted to have identified several significant issues relating to the fabric of the building with the value of these works exceeding available capital budgets. The report additionally notes that temporary building management and health and safety strategies in place are only suitable for the short term and in advance of permanent remediation.
46. The offer from AMG as it is currently drafted would require no Council capital investment, no future buildings liability, and no committed annual revenue payments or subsidy to the new tenant. The draft offer also provides for the continuation of the classical programme requiring no on-going contribution from the Council.
47. Whilst there are no works specified for the Council to undertake prior to any transfer at this stage, any liabilities on the Council should be clearly identified and agreed as part of the final Heads of Terms for the lease. Any commitments in this regard would need to be agreed and form part of future budget setting processes for both capital and revenue budgets.
48. The recommendation assumes the transfer of all staff associated with St David's Hall under TUPE regulations. This and any Pension Fund implications in relation to any transfer of responsibilities will need to be fully set out as part of the completion of the proposed lease.
49. The timing of the transfer, staff consultation and exact detail of the lease agreement may also have an impact on the achievability of budget savings for 2023/24 and any ongoing liabilities for the Council and will need to be reviewed accordingly as part of the finalisation of the contractual terms.
50. Initial VAT advice received by the Council on the status of the lease suggests that any potential future Council contribution may be subject to VAT. Therefore, in such an arrangement and in order for the Council to recover this VAT, the Council will need to exercise an option to tax over the whole site prior to any completion of the lease, in order that any interests in land granted are taxable rather than exempt supplies. In principle, this would allow for VAT recovery on any costs directly associated with these interests. Similarly, the Council has included a clause that the operator cannot dis-apply the option to tax in relation to the Land and will not do, or cause to be done, or omit to do anything which could lead to the option to tax being revoked or dis-applied by operation of law or otherwise.
51. Procurement and legal advice with regard to the draft Heads of Terms are set out in Confidential Appendix 6. Prior to agreeing the recommendations within this report and prior to the finalisation of any lease agreement, decision makers should ensure that they are satisfied with the findings in this regard.

52. The Subsidy Control Act 2022 comes into force in January 2023 and prior to finalisation of any contractual documentation, the Council must determine the requirements of this Act and ensure that any transactions proposed to be entered into are fully compliant.
53. Further consideration must be given to the legal, procurement and VAT implications of the report proposals as the Heads of Terms and ancillary documentation are finalised. It is recommended therefore that the Directorate seek further specialist advice in these areas as appropriate in order to ensure that the structure of any final contract sufficiently protects the Council's interests.

### **Legal Implications**

54. Procurement and legal advice with regard to the draft Heads of Terms are set out in Confidential Appendix 6 and prior to agreeing the recommendations within this report, decision makers should ensure that they are satisfied with the findings in this regard.
55. Further consideration should be given to any legal, procurement and VAT implications of the report proposals as the Heads of Terms and ancillary documentation is finalised. It is recommended that the Directorate seek further specialist advice in these areas as appropriate in order to ensure that the structure of any final contract sufficiently protects the Council.
56. Section 123 of the Local Government Act 1972 enables the Council to dispose of land "in any manner they wish", provided that best consideration is obtained, for any interest for a term exceeding 7 years (or an assignment which still has more than 7 years to run). Disposals of land for more than 7 years for less than best consideration require the consent of the Secretary of State. The Council intends to grant a lease for a term in excess of 7 years so it has instructed an independent surveyor to assess whether the offer it has been presented with for the leasehold transaction represents the best consideration reasonably obtainable.
57. Section 145 of the Local Government Act 1972 enables the Council to do, or arrange for the doing of, or contribute towards the expenses of the doing of, anything necessary or expedient for the provision of entertainment of any nature or the provision of a theatre, concert hall, dance hall or other premises suitable for the giving of entertainments and any purposes incidental to that provision.
58. In coming to its decision the Cabinet needs to take account of the Council's fiduciary duties to local residents and taxpayers.
59. The Cabinet must also make its decision having due regard to the Council's public sector equality duties pursuant to the Equality Act 2010 (including specific Welsh public sector duties). This requires the Council, in the exercise of its functions, to have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The protected characteristics are:

age, gender reassignment, sex, race - including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. If the recommendations in this report are accepted and when any alternative options are considered, the Council will have to consider further the equalities implication and an Equality Impact Assessment may need to be completed.

60. Equalities impact assessments will be undertaken as necessary as the proposals described within this report, are developed.
61. The Well-Being of Future Generations (Wales) Act 2015 (“the Act”) places a ‘well-being duty’ on public bodies aimed at achieving 7 national well-being goals for Wales – a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
62. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff’s Corporate Plan 2022-25.
63. The well-being duty also requires the Council to act in accordance with the ‘sustainable development principle’. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without comprising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
  - Look to the long term;
  - Focus on prevention by understanding the root causes of problems;
  - Deliver an integrates approach to achieving the 7 national well-being goals;
  - Work in collaboration with others to find shared sustainable solutions; and
  - Involve people from all sections of the community in the decisions which affect them.
64. The Cabinet must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible here:  
  
<http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>
65. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language.

*Procurement Law*

66. Detailed procurement advice in relation to the proposed transaction is set out in Confidential Appendix 6.

#### *Subsidy Control*

67. Detailed subsidy control advice in relation to the subsidy control implications of Options 1, 2 and 3 is set out in Confidential Appendix 6.

#### *Employment Law*

68. The Council currently employs 38 staff to deliver the Music and Arts programme at St David's Hall.
69. As Option 1 is essentially "as is" (albeit with the Council needing to invest in the venue), the staff would remain employed by the Council and the Council would retain responsibility for the cost of employing them.
70. If Option 2 is chosen, there is the potential for some or all of those staff to transfer from the Council to the Third Party under the Transfer of Undertakings (Protection of Employment Regulations 2006) (TUPE) and, in any event, the Heads of Terms provide for the Council and the Third Party to treat all staff currently employed by the Council at the venue as transferring under TUPE. The expectation from the Third Party is therefore likely to be that, whilst it would be responsible for those staff after the transfer, it would want certain indemnities from the Council under the Business Sale Agreement including for: all staff costs arising pre transfer; claims from transferring staff arising from pre transfer acts and omissions of the Council when the Council was their employer; and the risk of staff who have not been identified as being in scope to transfer alleging they should also transfer. The Council would also have obligations under TUPE to inform, and potentially consult, with the affected employees' representatives in relation to the transfer.
71. If Option 3 is chosen, as this would likely involve a procurement process and then a service/service concession arrangement to deliver the same/similar services, there is the potential for TUPE to apply to transfer staff to the operator and/or for it to be treated by agreement as a transfer under TUPE. If so, the position in terms of indemnities and obligations is likely to be as per Option 2 above.

#### *Pensions*

72. Any existing employees will likely be in the LGPS and it is likely that under any TUPE Transfer they will have Best Value Directions 2007 protection so any buyer would have to either enter an Admission Agreement to join the LGPS or set up a broadly comparable arrangement outside of the LGPS.
73. The Council should consider in advance any cost/ risk sharing processes it is prepared to use around both the buyer's ongoing contributions and any exit deficit, which may arise at some point in the future, to ensure they understand in advance the potential cost implications in allowing a negotiated pass through mechanism as part of the transfer.



## **Property Implications**

74. All immediate property implications are contained within the body of the report and supporting appendices.
75. The Corporate Property Strategy 2021-26 sets out targets relating to Modernisation of the estate, Carbon reduction and reduction of property running's costs. The proposals set out in this report assist the Council in achieving these targets.
76. The key risks associated with the building are clearly identified within Confidential Appendices 1, 2 & 3 and are currently being managed through a Building Management and Health and Safety Strategy, involving practical maintenance and monitoring measures. However, it is important to note that the risks associated with the RAAC planks remain and unless adequate finances and suitable remediation actions are implemented at the earliest possible time, it puts Cardiff Council in an unsustainable risk management situation.

## **HR Implications**

77. The legal implications set out in this report explain the TUPE requirements and pension implications. In addition to the requirements under the (Transfer of Undertakings (Protection of Employment Regulations) 2006 (TUPE), the requirements of the Welsh Government's Code of Practice on Workforce Matters (the Code) must be met (see Appendix 8).
78. The Code is designed to ensure that where public services are outsourced to a third party (including the private or third sector) and staff transfer: (a) TUPE will apply, and if TUPE does not strictly apply, the principles of TUPE will be followed unless there are exceptional reasons for not doing so; and (b) staff of the service provider (whether newly recruited or existing staff) undertaking work on that contract will be employed on terms and conditions which are no less favourable than those of transferred staff, with the exception of pension arrangements where reasonable pension provision must be made as indicated in the Code. The Code requires the contracting authority, in this case the Council, to monitor the implementation of the Code by service providers wherever it applies, and to provide an annual report to the Welsh Government.
79. Agency workers at St David's Hall that have been continuously engaged in the same role for a fixed number of hours per week for the last 4 years, and those that have been doing the same for a period of 2 years, will be offered contracts of employment in accordance with the Fair Worker Policy (either permanent contract or temporary). This will mean that they will be covered by the TUPE legislation. AMG would need to determine for themselves the future use of Agency workers.

80. The trade unions, staff and agency workers have been briefed on the recommendations set out in this report, with a commitment for further engagement once a decision is taken on the options by Cabinet. If required, a formal consultation period will need to take place with staff on a TUPE transfer.

## RECOMMENDATIONS

Cabinet is recommended to:

1. Note the Outline Business Case attached at Confidential Appendix 4.
2. Approve, in principle the offer from AMG (set out as Option 2 in this report) and further described in the Outline Business Case at Confidential Appendix 4, the draft Heads of Terms at Confidential Appendix 5 and delegate authority to the Director of Economic Development in consultation with the Cabinet Member for Culture, Parks and Events, the Section 151 Officer and the Legal Officer to progress negotiations with AMG and for Legal Services to prepare proposed contractual documentation.
3. note that consultation will be undertaken as follows:
  - a. Public consultation as part of the Council's budget setting process, and;
  - b. Consultation with affected staff in relation to a potential transfer to AMG under the Transfer of Undertaking (Protection of Employment Regulations 2006 ("TUPE").
4. note that findings of the consultation, together with an assessment of best value of the AGM offer will be brought back to Cabinet for consideration as part of a final decision on whether to proceed with the offer from AMG.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Neil Hanratty</b> <b>Director of Economic Development</b>
	<b>9 December 2022</b>

*The following appendices are attached:*

### Appendices

- Confidential Appendix 1** - Conditions Survey 2021
- Confidential Appendix 2** - Conditions Survey Cost Report
- Confidential Appendix 3** - Property Management Summary
- Confidential Appendix 4** - Outline Business Case
- Confidential Appendix 5** - AMG Proposal - Heads of Terms
- Confidential Appendix 6** - Legal Advice
- Confidential Appendix 7** - Financial Overview

**Appendix 8 – HR Note**  
**Appendix 9 - Equality Impact Assessment**

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## **St David's Hall**

### **TUPE/Welsh Government's Code of Practice on Workforce Matters/Agency Workers**

#### **Briefing Note**

#### **Introduction**

1. The following explains the impact of TUPE legislation and the Welsh Government's Code of Practice on Workforce Matters (the Code) arising from Options 2 and 3 of the Cabinet Report in relation to St David's Hall, Cardiff. It also sets out the implications for agency workers.
2. The Cabinet report states that the Council has received an unsolicited offer from Academy Music Limited ("AML") setting out a proposal to acquire and operate St David's Hall as an Academy venue by way of a long-term lease. The offer includes taking full responsibility for the liability of the building, ring-fencing and protecting a classical programme, protecting the acoustic value of the auditorium and securing existing jobs. This is Option 2.
3. Option 3 within the Cabinet report is to consider the appropriateness and viability of undertaking a public procurement exercise [by engaging with providers in the market] to establish whether the wider market would be able to provide improved value.

#### **TUPE**

4. Should Option 2 or 3 be chosen, and the venue and its operations transfer from the Council to AML or another organisation, the result would be that the Council's employees would transfer under the Transfer of Undertakings (Protection of Employment Regulations 2006) (TUPE).
5. Under TUPE, employees have certain protections in law. Their terms and conditions of employment, such as pay, holidays and sick pay provision, (apart from occupational pensions) and continuity of service transfer with them. They also receive certain protections around dismissal and redundancy.

#### **The Code of Practice on Workforce Matters (The Code)**

6. The Code should be applied whenever public services in Wales are to be outsourced to a third party. Procurement and contracting exercises should be conducted on the basis that the TUPE Regulations 2006 will apply unless there are exceptional reasons why this should not be the case.
7. The implications for Cardiff Council are that at the earliest possible stage in the contracting process the Council must state that employees will be eligible to transfer and this will normally have the effect of causing TUPE to apply.

8. Even where TUPE does not strictly apply, the Code requires that the principles of TUPE should be followed, and the employees should be treated no less favourably than they would have been had the Regulations applied. This includes compliance with the provisions of A Fair Deal for Staff Pensions, which was revised in 2013.
9. The Code requires the contracting authority, in this case the Council, to monitor the implementation of the Code by service providers wherever it applies, and to provide an annual report to the Welsh Government.
10. The Code also requires that new joiners to the transferred-out workforce are offered terms and conditions (e.g, pay, holidays, sickness provisions) which are no less favourable than those of the transferred employees. This does not apply to pensions, but new joiners must also be offered a reasonable pension provision as indicated in the Code.

### **Pensions**

11. Existing employees are likely to be in the Local Government Pension Scheme (LGPS) and under any TUPE and the Code the Third Party would have to either enter an Admission Agreement to join the LGPS or set up a broadly comparable arrangement outside of the LGPS.
12. The Council has experience of TUPE transfers and the most significant are the Leisure Services contract, and more recently, the transfer of the New Theatre.
13. In the case of the Leisure Services contract the Council required the operator to acquire 'Admitted Body' status to the LGPS and this pension scheme should both continue to apply to the employees who transferred, but also new employees employed after the transfer to deliver the leisure services in Cardiff.
14. In the case of the New Theatre, the operator secured 'Admitted Body' status for the employees who transferred, and new employees can access the organisations' own pension scheme.

### **Issue for Decision**

15. There is a clear expectation of the Code that new employees are offered no less favourable terms. This needs to be clearly set out in contract arrangements.
16. As the Council has experienced different arrangements in the application of the Code as far as pension arrangements are concerned, there needs to be a decision on the expectations of the Third Party with regard to the pension provisions.
17. Whilst the expectation for the Third Party to secure 'Admitted Body' status is clear, does the Cabinet wish for new employees to be able to access the LGPS as was the case for the Leisure Services contract/TUPE transfer, or to apply the same arrangements as applied to the New Theatre.

## **Agency Workers**

18. The Council recently agreed a Fair Worker (Long Term Agency Worker) Policy which provides for offers of permanent employment to those agency workers who have 4 or more years continuous assignment (with breaks equivalent to annual leave) in a role with the Council. Those with more than 2 years, but less than 4 years, continuous assignment (with breaks equivalent to annual leave) will be offered a temporary contract of employment with the Council.
19. The pool of agency workers engaged at St David's Hall who meet the criteria set out in the Fair Worker Policy will be offered either permanent or temporary contracts, as appropriate. It is expected this will apply to those agency workers who have been continuously engaged in the same role for a fixed number of hours per week, for either 4 or 2 years. This will mean that they will be covered by the TUPE legislation.
20. Those agency workers who do not meet the criteria will be engaged continuously in a role for 4 years or more. Agency workers at SDH who have been continuously engaged in the same role for a fixed number of hours per week for the last 4 years, and those that have been doing the same for a period of 2 years, will be offered contracts of employment in accordance with the (either permanent contract or temporary).
21. In other cases, AMG will need to determine for themselves the level of use of agency workers moving forward. They will be provided with the names of the agencies used by the Council for St David's Hall.

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Equality Impact Assessment  
Corporate Assessment Template

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

**Policy/Strategy/Project/Procedure/Service/Function Title:** St. David's Hall Project

**New/Existing/Updating/Amending:** New

**Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?**

Name: Chris Barnett

Job Title: Operational Manager

Service Team: Major Projects

Service Area: Economic Development

Assessment Date: October 2022

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

The Corporate Property Strategy report was presented to Cabinet on 16th December 2021 and highlighted the findings of full Conditions Surveys and associated costings for St. David's Hall. Approval was given by Cabinet to develop an Outline Business Case to consider the future investment requirements for St. David's Hall taking into account the recent surveys.

An external consultancy with industry knowledge and expertise was commissioned to produce an Outline Business Case exploring the following options:

- The Council retaining control of the venue
- Accepting a proposal made by a third party to become a commercial operator of the venue
- Investigation of market opportunities

**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

As part of the commissioned OBC report, regional/local demographic information and cultural engagement information was reviewed to understand current product-based use and demand and how this may change with an alternative delivery model in the future.

## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

This data highlights a demographic profile of St. David's Hall catchment area and cultural engagement levels and as such suggests how this data may be used to widen / strengthen the diversity of venue customers in the future.

Following the completion of this Outline Business Case, a report will be presented to Cabinet in December 2022 to present the findings of the OBC and to seek a decision on the options proposed.

Depending on which option Cabinet decide to proceed with will result in different impacts both positive and negative.

The responses to Section 3 offer suggested, potential impacts to these options.

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	P		
18 - 65 years	P		
Over 65 years	P		

#### **Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Option 1 - an in-house Council retained option would result in no change and therefore no differential impact, however if this option becomes unviable in the future then the Council may be in a position where the facility closed which would have a negative impact on all user groups.

Option 2 – the AMG proposal seeks to expand the diversity of acts/events by bringing an Academy product to the city centre which would have a positive impact to all age groups. The offer also outlines a commitment to continuing to accommodate a classical and community programme. Therefore, should this continue to support events such as youth orchestra and school activities then no differential impact would take place for younger people.

The classical programme tends to appeal to an older demographic. Retention of a classical programme would result in no differential impact to this group.



# CARDIFF COUNCIL

## Equality Impact Assessment Corporate Assessment Template

**What action(s) can you take to address the differential impact?**

### 3.2 Disability

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment			
Physical Impairment			
Visual Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			
Mental Health			
Substance Misuse			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

An as-is position by proceeding with an in-house retained model would result in no differential impact. However, the current accessibility of the building has its limitations and needs investment to improve accessibility. If a decision were taken to retain St. David's Hall in-house then such improvements would likely be delayed due to budget constraints.

If the in-house option proved unviable due to budget considerations the council may be forced to close the facility. The impact of closure would have a negative on all user groups.

Option 2, with acceptance of the AMG proposal would result in significant investment to the building thus improving and modernising communal areas.

**What action(s) can you take to address the differential impact?**

Option 1 - access improvements to be made as and when budget allows.

Option 2 - access improvements as part of AMG proposal.

### 3.3 Gender Reassignment

4.C.400	Issue 1	Aug 22	Process Owner: Dylan Owen	Authorised: Dylan Owen	Page 3
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**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

An as-is position by proceeding with an in-house retained model would result in no differential impact.

The AMG proposal to invest in the building would result in upgrading and modernisation of communal areas. This presents an opportunity for the provision of gender-neutral toilets which would have a positive impact.

**What action(s) can you take to address the differential impact?**

**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			x

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Neither option would make a differential impact.

**What action(s) can you take to address the differential impact?**

**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

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**3.5 Pregnancy and Maternity**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	<input type="checkbox"/>	<input type="checkbox"/>	X
Maternity	<input type="checkbox"/>	<input type="checkbox"/>	x

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Neither option would make a differential impact.

**What action(s) can you take to address the differential impact?**

**3.6 Race**

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mixed / Multiple Ethnic Groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Asian / Asian British	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Black / African / Caribbean / Black British	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other Ethnic Groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The venue currently operates a diverse programme of community events, therefore an in-house Council retained option would result in no change and no differential impact.

**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

<p>The impact of closure would have a negative impact on all user groups.</p> <p>The AMG proposal seeks to expand the diversity of acts/events by bringing an Academy product to the city centre which may include music genres not currently part of the St. David’s Hall offer which may appeal to community groups that don’t currently use the venue , this would result in a positive impact. The offer also outlines a commitment to continuing to accommodate a community programme, therefore should this continue to support events community group events then no differential impact would take place.</p>
<p><b>What action(s) can you take to address the differential impact?</b></p>
<p>Option 2, seeks to expand provision of acts as part of the AMG proposal.</p>

**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			
Christian			
Hindu			
Humanist			
Jewish			
Muslim			
Sikh			
Other			

<p><b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b></p>
<p>Option 1 would make no differential impact.</p> <p>Option 2 may present a positive impact with an expansion in programme diversity.</p>
<p><b>What action(s) can you take to address the differential impact?</b></p>

CARDIFF COUNCIL

Equality Impact Assessment  
Corporate Assessment Template

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**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men			
Women			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Neither option would make a differential impact.

**What action(s) can you take to address the differential impact?**

**3.9 Sexual Orientation**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual			
Gay Men			
Gay Women/Lesbians			
Heterosexual/Straight			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

CARDIFF COUNCIL

Equality Impact Assessment  
Corporate Assessment Template

Neither option would make a differential impact.

**What action(s) can you take to address the differential impact?**

**3.10 Socio-economic Duty**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

	Yes	No	N/A

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

An as-is position by proceeding with an in-house retained model would result in no differential impact. The impact of closure would have a differential impact based on the current demographics of the user groups

Should the Council proceed with the AMG proposal there may be a change to ticket prices. If these were to increase this would result in a negative impact.

**What action(s) can you take to address the differential impact?**

**3.11 Welsh Language**

Will this Policy/ Strategy/Project/Procedure/Service/Function have a **differential impact (positive/negative)** on the Welsh Language?

	Yes	No	N/A

**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

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**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

Neither option would make a differential impact.

**What action(s) can you take to address the differential impact?**

**4. Consultation and Engagement**

What arrangements have been made to consult/engage with the various Equalities Groups?

A decision on the future of St. David's Hall is required before a comprehensive engagement programme can be developed and implemented.

The project will commit to undertaking a full consultation and engagement programme with Equalities groups.

**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	

## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Socio-economic Duty	
Welsh Language	
Generic Over-Arching [applicable to all the above groups]	

#### 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Chris Barnett	Date:
Designation: Operational Manager – Major Projects	
Approved By:	
Designation:	
Service Area:	

7.1 On completion of this Assessment, please ensure that the form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk).

For further information or assistance, please contact the Equality Team- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)



**SCHOOL ORGANISATION PROPOSALS: MOORLAND EARLY YEARS UNIT AND REPLACEMENT FLYING START: PROCUREMENT OF CONTRACTOR FOR CONSTRUCTION**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 6**

**Appendices 2 and 5 to this report are exempt from publication on the basis that it contains information of the description set out in paragraphs 14 and 21 of Part 4 of schedule 12 A of the Local Government Act 1972 and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.**

**Reason for this Report**

1. To request Cabinet to authorise the funds for the main contract required from the Council's Education Asset Renewal programme, subject to Ministerial approval for the enhanced Flying Start Welsh Government contribution, to enable the Moorland Primary School project to commence.
2. To delegate responsibility to the Director of Education (in consultation with the Director of Economic Development and S151 Officer) for all matters relating to the procurement of the project (up to and including award) and completion of ancillary documents (as applicable).

**Background**

3. Moorland's Primary School has seen deterioration of some of its buildings over recent years, particularly in relation to the Early Year's unit. A development on site also presents an opportunity to address some of the increasing demand for ALN spaces and to expand to support the national childcare offer commitment for 3-4 year olds in the local area.
4. At its meeting on 14 July 2022, Cabinet agreed to establish a 20 place Specialist Resource Base for primary aged children with Complex Learning Needs at Moorland Primary School from September 2023. The Cabinet paper and Statutory Notice is enclosed in **Appendix 1**.

5. Within the paper it was proposed to establish a Special Resource Base (SRB) for primary aged children with Complex Learning Needs (CLN) at Moorland Primary School from September 2023. It also outlined the scope of the project, including:
  - Replace the Moorland Early years unit;
  - Provide a replacement Flying start from Willows High School increasing from 32 to 44 with 8 childcare offer spaces for 3 and 4 year olds;
  - Provide a crèche and community room for parenting and community use;
  - Provide a 20 place Specialist Resource base for Complex Learning needs;
  - Demolish care takers house.
6. The scheme sits within the Council's Education Asset Renewal Programme and currently includes a contribution of £1.3m from Welsh Government for the provision of Flying Start.
7. The Director of Education, under delegated authority, gave authorisation to proceed to tender on 12 November 2021 in line the Council's delegations.
8. The Council commenced the project in 2020, but came across market challenges with market interest. The project was tendered via the SEWSCAP framework in January 2022 and received no tender returns. Feedback included the project complexities (such as a live school operating on the confined site), substantially increased demand for construction in the industry and the type of construction considered.
9. Following discussions with SEWSCAP framework contractors one has confirmed that it would be able to tender at a later date, due to resourcing issues at the time. As fully detailed in **Confidential Appendix 2** this response has now been received and is considered value for money. However, the project value is now above officer delegations.

## Issues

### Condition and Suitability

10. Moorland Primary school is rated at both Condition B and Suitability B, however this does not reflect the severely deteriorating condition of the early years unit which is not a suitable learning environment. A letter in **Appendix 3** has been provided by the Chair of Governors to outline concerns.
11. **Appendix 4** also outlines a report on the significant condition issues in the building. Substantial remedial works are ongoing to avoid a complete closure of the early years building, due to increasingly unsafe roofing and leaks. Daily maintenance creates additional pressure on staffing and management of the school.

12. Replacing this part of the school is therefore essential to avoid a scenario whereby the Council cannot fulfil its statutory responsibility to provide appropriate education for children.

### **Land matters relating to Moorland Primary School**

13. The Council has been progressing works to replace early years accommodation at Moorland Primary School and to re-locate Flying Start provision currently on the site at Willows High School.
14. Flying start are currently based at Willows High School and a new school will be built on land at Splott Market in 2025 as part of the Band B programme. Therefore, an alternative location is required.
15. The Flying Start unit would also have a community room for delivery of parenting courses and a creche facility. The community room would also be for the school to use out of hours and wider community use. For Flying Start and childcare to operate within the new building, a re-registration will need to take place with Care Inspectorate Wales (CIW).
16. Early years provision for Moorland Primary School is in a demountable unit at the rear of the school site. The unit has been rated as condition C. It currently accommodates 64 part-time Nursery places and 60 Reception class places. The size of the nursery will remain the same and is appropriate for the demand in the area. The new Early years building would be built in the playground, this existing unit would be removed.
17. Accommodation for the Early years Specialist Resource Base (SRB) would be provided as part of this planned work, within the same unit. The junior SRB will be an existing first floor classroom with adaptations required to make it suitable for the needs of the pupils.
18. There is currently a boxing club located on part of the Moorland Primary School site. At present, the school redevelopment project is not reliant on the boxing club land. However, if this was to become available at a later date it would be beneficial to the school as it is a confined site. The cost of the demolition for this is currently not factored into any budget.
19. The former Ysgol Glan Morfa school building is currently being appraised by the Council's housing department in relation to the delivery of Council housing on the site. Completion of the demolition is due in December 2022. The capital receipt for this will contribute to the Council's disposal targets and is outlined in **Appendix 5**.
20. The Caretaker's house sits within the school footprint. This will be demolished as part of the project. There is no capital receipt to be realised associated with this as the land will be reallocated for the school's use.

## **Complex Learning Needs Specialist Resource Base**

21. The majority of learners with Additional Learning Needs (ALN) attend a local mainstream school and benefit from effective Additional Learning Needs Provision (ALP). These learners do not need to attend a special school or Specialist Resource Base.
22. However, the number of pupils with severe and complex needs, who need a place in a special school or specialist resource base has continued to grow.
23. This is due to a number of factors including:
  - pupil population changes
  - improved survival rates for children born with significant disabilities,
  - increased complexity in needs
  - increased incidence and identification of specific needs such as autism, ADHD, physical disabilities and sensory impairments
24. The range of expertise, specialist support and facilities required in special schools and Specialist Resource Bases (SRBs) has also increased.
25. Whilst there are a number of existing specialist settings across Cardiff, there are not enough places available. The number of children who would benefit from a place is projected to increase over coming years.
26. At its meeting on 14 July 2022, Cabinet agreed to proceed to establish a 20 place Specialist Resource Base for primary age children with Complex Learning Needs at Moorland Primary School from September 2023. Placement within the SRB at Moorland Primary School would be subject to an Individual Development Plan (IDP). The proposed capacity for 20 pupils would be in addition to the capacity of mainstream places in the school.
27. The Cabinet also agreed to expand special schools and SRBs for primary age children with Complex Learning Needs by 180 places at five other schools city-wide, and to establish an SRB for 30 secondary age learners with Complex Learning Needs at Willows High School from September 2023, to meet the current and forecast need for places.
28. Each of the existing English-medium Specialist Resource Bases for primary age Learners is expected to be fully occupied in coming years, with admissions appropriately phased to best meet the needs of learners.
29. Each of Cardiff's special schools and SRBs is a city-wide provision, and the SRB at Moorland Primary School would improve the overall distribution of specialist provision across Cardiff. However, the SRB at Moorland Primary School would also be the first specialist provision within the Splott community. Children with Complex Learning Needs resident in Adamsdown and Splott are currently transported to other areas of the city to access appropriate specialist provision. Learners

living in these areas of the city have the potential to access specialist provision closer to home, reducing the time they spend travelling to and from school.

30. The establishment of the SRB will offset the projected increase in spending on places in other Council areas or in independent schools. Without investment in additional in-county places, such spending on places would be expected to grow significantly in future years.
31. The differential in average per-pupil revenue costs between placements in Cardiff's special schools and SRBs, and in alternative independent provision, vary greatly. The current differential in average per-pupil revenue costs between placements at a Cardiff special school or in an SRB, and in alternative independent provision, are greater than £50,000 per year, per learner, plus transport costs. However, there are not sufficient places available in other Council areas or in independent schools within a reasonable travel distance for the number of learners projected to require such support.
32. The additional costs per place in the SRB at MP School have been calculated at c£15,000 per learner based on 2022/23 funding levels. The admission of learners to the base would be phased over coming years.
33. The annual cost to the Council of school transport for learners with Complex Learning Needs / Autism Spectrum Condition to within-County provision averaged c£5,000 per learner in 2021/ 2022. The annual cost to the Council of school transport for learners with Complex Learning Needs / Autism Spectrum Condition to alternative independent provision is c£10,000 per child. However, transport costs can fluctuate considerably depending on the home address of the pupils attending a special school.
34. The implementation of the proposed changes will incur increased home to school transport costs for the Council as some, if not all, learners will be eligible for free home to school transport.
35. When compared to the approximate cost of a Complex Learning Needs placement in alternative provision, the additional revenue costs of 48 additional places at MPS would total c£300,000 based on the current average of c£15,000 per learner. When compared to placements in alternative independent provision at c£50,000 per learner, the SRB to meet these learners' needs would reduce the Council's annual cost liability by c£700,000 for placements alone, unless an alternative provision were identified. Overall, the proposed changes would result in a more efficient use of financial resources compared with spending on placements in, and transport to, other Council areas or independent schools.

## Mainstream places

36. The proposed placement of the Early Years unit at Moorland Primary School, replacing two Reception classes and a nursery class, would provide sufficient places for future intakes to the school.
37. The below table sets out the recent Number on Roll data for the school, from May 2022 and previous summer terms (when Nursery places are at highest occupancy). The number of pupils on roll at the school in Reception to Year 7 has marginally exceeded its published capacity of 378 places and the number of pupils enrolled in the Reception class has closely aligned to its capacity of 64 part-time places.

Table: School Number on Roll Data – Summer term 2019 - 2022										
School	Nursery	Rec	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Number On Roll (Rec – Year 6)	
2022	62	51	59	60	53	55	57	48	383	
2021	53	58	58	54	56	55	58	53	392	
2020	Data not captured – schools closed									
2019	64	59	53	57	55	58	60	49	391	

38. Whilst intakes to schools city-wide are falling, and the number of children resident in the catchment area of Moorland Primary School entering Reception in the period 2023/2024 to 2025/2026 will be at lower levels than in recent years, it is anticipated that intakes to schools will stabilise and begin to rise towards the end of the decade.
39. Retaining sufficient capacity to continue to admit up to 64 nursery age children and up to 60 children to Reception year therefore provides an appropriate balance in the availability and forecast take up of places.

## Flying Start

40. This expansion from 32 PTE places to 44 PTE for Flying start, contributes to Welsh governments commitment to a phased roll out of the part time, high quality childcare element of Flying Start to 2-3 year olds, from April 2023 and also provides an opportunity to support the national childcare offer commitment for 3-4 year olds.
41. The Flying start programme aims to:
- maximise child development outcomes to support the best start in life, particularly for our most disadvantaged children;

- address inequality and alleviating some of the impacts of deprivation;
  - support and strengthen Welsh medium provision; and
  - address gaps in the availability of provision
42. Flying start is currently based at Willows High school in a standalone bespoke unit, which was previously funded by Welsh Government. Willows will be moving to a new build in a different location In September 2025.
43. The current Flying start unit, once vacated, was planned for Tremorfa Nursery to move into, which is also dilapidating. The projects are closely dependant on another. The first in the chain is for Flying start to move to Moorlands primary school
44. Once completed, the building would accommodate up to 52 Children, this is an increase from 36 at the current Flying start provision, and a designated creche and space for parenting provision. In addition to 8 childcare offer spaces.
45. Developing this option has enabled Flying start to extend its reach locally, by including additional LSOA's. These LSOA's have a high proportion of families on income benefit with children 3 years and under. Families from these LSOA's signed up to the Flying Start Programme during September 2022 this resulted in 65 children becoming eligible for Flying Start services, including approximately 16 children aged 2-3 years and who are therefore eligible to receive the Flying Start childcare offer immediately.
46. The project team have looked at different solutions to ensure that the project can go ahead. From dividing the project up, or not implementing the flying start.
47. If the investment into the project does not go ahead, there will be a shortfall of places for families identified for the need of the flying start programme, of which these are entitled to. There are no existing providers within the locality to offer the provision for these children.
48. By completing this project, it will provide continuity of education provision to the families and community for pupils from age 2. The inclusion of childcare offer places also promotes and supports the opportunities for parents to enter/ remain in work and training.

### **Scrutiny Consideration**

49. The Children & Young People's Scrutiny committee are due to consider this item. Any comments received will be circulated at the Cabinet meeting.

## **Financial Implications**

50. This project has been awarded WG Flying Start Capital Grant funding to the sum of £1.3 million. Additional funding may be available with further bids to WG planned. The total remaining costs will need to be funded through additional grant allocation, the existing Education capital programme or capital receipts. The capital receipt for Glan Morfa land will be used to offset any need to use capital programme budgets but is unlikely to cover the full balance, with the timing of the capital receipt requiring consideration in line with the current capital programme.
51. Any additional revenue costs in relation to the maintenance and provision of the unit will remain the responsibility of the school. As schools delegated budgets are based on pupil numbers, these will need to be included in any future budgets, which may put additional pressure on overall schools' budgets.
52. The decision maker should have assurance on the overall affordability of any projects or schemes taken forward and should also consider the impact on sustainability of other schools within the localities identified, including pupil numbers and financial risks, including potential funding streams.

## **Legal Implications**

53. Legal Services are instructed that the proposal will be to direct award via a Framework Agreement (subject to approval in recommendation 1 and delegated approval in recommendation 2). Legal services has not reviewed the framework. Before placing reliance on a framework and awarding a contract, in summary, the decision maker should satisfy itself that the Council was identified in the contract notice (advertising the framework opportunity) as a party entitled to use the framework and the framework process allows for a direct award. The client department should also satisfy itself as to the T&CS and as to whether they are suitable for their requirements before awarding the contract.
54. Any direct award needs to be approved by procurement.
55. In addition to the above the service area should be satisfied that the direct award represents best value. Best value is normally established through the running of a competitive tender exercise. In the absence of such a competitive tender exercise the report should make clear why the direct award represents best value and how the authority has been able to satisfy itself on this point.
56. Any further legal implications (if any) with regards the procurement will be set out in the delegated report referred to in recommendation 2.

## **Equality Act 2010**



57. In considering this matter the decision maker must have regard to the Council's public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. If the recommendations in the report are accepted and when any alternative options are considered, the Council will have to consider further the equalities implication and an Equality Impact Assessment may need to be completed.

### Well Being of Future Generations (Wales) Act 2015

58. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
59. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan 2022-25. When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
60. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
61. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory

Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### General

62. The decision maker should be satisfied that the proposed decision is in accordance within the Council's budget and policy framework.
63. The decision maker should also have regard to, when making its decision, to the Council's wider obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.
64. With respect to the flying start contract, further legal advice should be sought if there are any changes to current flying start contracts as a result of the proposed recommendation.

### Human Resources implications

65. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Specialist Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Specialist Resource Base will provide opportunities for school-based staff on the school redeployment register.

### Property Implications

66. Strategic Estates are supporting Education on the funding of the Moorland School development through managing the disposal of the former Ysgol Glan Morfa site which adjoins the Moorland Primary site. This capital receipt is ring fenced towards the delivery of the Moorland School Nursery and we will ensure best value is achieved through the disposal process.
67. The valuation for the former Ysgol Glan Morfa site is enclosed in the **Confidential Appendix 5**.

### Highways and Transport Implications

#### Transport matters relating to Moorland School SRB

68. The proposed SRB on the site of Moorland Primary School would serve pupils in the south-central area of Cardiff and so is well-placed given its relatively central location, proximity to public transport routes and facilities, and potential for active travel connections.
69. A transport assessment has been carried out with highways and transport improvements identified.

70. Learner Transport will need appropriate facilities for drop-off and pick-up. As the site is very constrained, initial considerations suggest the use of the adjacent turning circle on the Singleton Road cul-de-sac along the western boundary of the site to provide a designated area. This is directly adjacent to the school building access and would provide suitable access from Learner Transport vehicles. The designated area can be provided through implementation of parking and loading restrictions.
71. A review of parking and loading restrictions in the adjacent streets (including Moorland Road on the east side of the site) will be undertaken with a view to introducing additional restrictions where required to avoid congestion and parking issues. The potential for introducing a School Street at the lower end of Singleton Road will be investigated as part of this work. Any measures would be delivered by the transport team with funding from Welsh Government's Active Travel Fund grant.
72. Further proposed school safety measures would include improvements to road crossings, and general improved facilities for pedestrians and cyclists, including along desire lines through Moorland Park.

### **Equality Impact Assessment**

73. An initial Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society. This assessment will be reviewed after consultation.
74. A Statutory Screening Tool including Equality Impact Assessment is attached as **Appendix 6**.

### **Reasons for Recommendation**

75. It is recommended to authorise funds and delegate delivery to officers for the following reasons:
  - Avoid any further delays on implementing the SRB provision.
  - Address the condition of the current school estate to meet statutory requirements.
  - Ensure the Suitability of the current school to meet the demands of 21<sup>st</sup> century learning
  - To meet demand for special school places for primary age learners with complex learning needs, to enable pupils to received specialist education within their local area.

### **RECOMMENDATIONS**

The Cabinet is recommended to

- (i) authorise the funds for the main contract required from the Council's Education Asset Renewal programme, subject to Ministerial approval for the enhanced Flying Start Welsh Government contribution, to enable the Moorland Primary School project to commence.

- (ii) subject to Ministerial approval for the enhanced Flying Start Welsh Government contribution, delegate responsibility to the Director of Education (in consultation with the Director of Economic Development and S151 Officer) for all matters relating to the procurement of the project (up to and including award) and completion of ancillary documents (as applicable).

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Melanie Godfrey</b> <b>Director of Education &amp; Lifelong Learning</b>
	9 December 2022

*The following appendices are attached:*

### **Appendices**

- Appendix 1: Previous Cabinet Paper
- Appendix 2: Confidential Cost Summary
- Appendix 3: Letter from Chair of Governors
- Appendix 4: Condition of Early Years Unit
- Appendix 5: Confidential Valuation Report
- Appendix 6: Equality Impact Assessment

**SCHOOL ORGANISATION PROPOSALS: PROVISION FOR CHILDREN AND YOUNG PEOPLE WITH ADDITIONAL LEARNING NEEDS (ALN)**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 4**

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**Reason for this Report**

1. To enable the Cabinet to consider recommendations to hold public consultation on proposals to transfer, expand and redevelop The Court Special School in line with the Band B 21<sup>st</sup> Century Schools priority scheme, and on the proposed establishment of specialist learning resource base provision at Moorland Primary School.
2. It is proposed to:
  - Increase the capacity of The Court Special School from 42 to 72 places. The school would transfer to new build accommodation across two sites at Fairwater Primary School and the current St Mellons, CiW Primary School site in Llanrumney with 36 pupils on each site from September 2025.
  - Establish a Special Resource Base (SRB) for primary aged children with Complex Learning Needs (CLN) at Moorland Primary School from September 2022.

**Background**

3. At its meeting on 14 December 2017, the Cabinet approved the prioritised scheme under Band B of the Cardiff's Band B 21st Century Schools Programme.
4. The Band B Programme seeks to address the most acute sufficiency and condition issues in Cardiff. Four special schools are identified for redevelopment: Riverbank Special School and Woodlands High School, for pupils with complex learning needs/ autism, and The Court School and Greenhill School, for pupils with emotional health and wellbeing needs.

5. Proposals in relation to Riverbank and Woodlands were agreed by the Welsh Minister on 21 July 2020. This paper sets out the proposals in relation to The Court School. Proposals regarding specialist provision for secondary age pupils with emotional health and wellbeing need and Greenhill School will be brought forward in later in the year. A copy of the 14 December 2017 Cabinet Report is included at Appendix 1.
6. Places for pupils with Complex Learning Needs are offered in a range of settings across Cardiff which support identified pupil needs. This includes supported placements at both primary and secondary level in mainstream school and places in Specialist Resource Bases and special schools.
7. At present, both primary and secondary schools in Cardiff host specialist resource base provision. Some are designated to support children with complex learning needs who require a specialist curriculum taught in a small class environment; some are designated for learners with autism or hearing impairments who require specialist support to access mainstream learning, with access to a nurturing base for some learning and unstructured time.
8. The purpose of a SRB designated for complex learning is to enable learners with severe learning difficulties to succeed in a mainstream school environment. Pupils are taught in a small class by specialist staff and benefit from a specialist curriculum, while benefiting from the full range of education opportunities available to all pupils at the school.
9. The number of children requiring specialist placement as a result of their complex learning disabilities has been increasing in Cardiff over the last 5 years, and steps were taken in 2018 to increase the number of specialist places available.
10. A review of cases of children aged 0-3 with ALN, known to the Council, confirms that the number of children with complex needs admitted to Reception year will continue to grow in coming years despite a fall in total school intakes.
11. Band B projects to expand special school places at Riverbank and Woodlands Special Schools are underway, but further work is needed to increase resource base provision in the short term to increase the range of options for learners with complex learning needs.
12. The majority of resource base places are currently located in the north and east of the city. To improve access to resource base places for children living in the central south areas of the city, it is proposed to establish a base at Moorland Primary School.

## Issues

### Condition and Suitability

13. Cardiff has a very large education estate, with over 127 school properties. Many sites comprise of multiple blocks, constructed during different decades. A large number of primary, secondary and special schools are in a poor state of repair.
14. Approximately £17m, or 14%, of maintenance and condition issues of the estate have been addressed through Band A of the 21st Century Schools investment programme. There has been significant investment in the construction of two new high schools in the East and West of the City, new primary school provision and suitability works undertaken in primary schools.
15. This nonetheless leaves a significant maintenance backlog of approximately £68m, of which circa £8m is Equality Act 2010 compliance. The Local Authority's current spend on school asset renewal has been circa £4.7m per annum. In 2018-2019, the Council allocated an additional £25m of funding over the next 5 years to the school's asset renewal budget. This resource is allocated on a priority basis and is predominantly limited to keeping properties safe and watertight.
16. As part of the prioritisation of schools within the Band B programme, all properties across the school estate were given a rating from A to D for the following issues, with D being the worst category:
  - Sufficiency of places available;
  - Condition of the school buildings;
  - Suitability of the environment for teaching.
17. The Court Special School is rated D for condition and D for suitability, with 'unsuitable' learning environments, which seriously inhibit the school's capacity to deliver the curriculum.
18. Replacing and significantly expanding this school is therefore essential if the Council is to fulfil its statutory responsibility to provide appropriate education for children with Additional Learning Needs.

### Sufficiency in the Special Sector

19. The majority of learners with ALN attend a local mainstream school, and benefit from effective Additional Learning Provision (ALP), without the need for special school or Specialist Resource Base places. However, the number of pupils with severe and complex needs, requiring a place in a special school or specialist resource base has continued to grow due to:
  - Pupil population changes, with the larger primary cohorts now moving through to secondary phase.

- Improved survival rates for children born with significant disabilities, resulting in a higher incidence of severe and complex disabilities. Cardiff schools are highly inclusive, and the extent to which pupils' additional learning needs can be met in their local schools has increased steadily; however, the increased complexity of the population has meant that the need for specialist provision has continued to grow, and the range of expertise, specialist support and facilities required in special schools and SRBs has also increased.
  - Increased incidence and identification of specific needs such as autism, ADHD, physical disabilities and sensory impairments.
  - Higher incidence of children and young people with emotional health and wellbeing needs, a trend which pre-dates COVID 19, but has been exacerbated by school closures and other measures to manage the pandemic.
20. At the end of March 2021, Cardiff maintained 2265 statements. As the population grows, so will the number of children and young people with significant and complex Additional Learning Needs.
  21. Cardiff Council is committed to the principles of inclusion and recognises that the majority of children and young people with additional needs are best supported in their local mainstream schools. The Council will continue to provide support, training and resources to schools, promote the sharing of best inclusive practice and ensure that learners with ALN access effective support in their local school.
  22. However, it is recognised that in order to thrive and fulfil their potential, children and young people with the most complex Additional Learning Needs require access to the specialist environments and expertise of a special school or specialist resource base (SRB).
  23. In 2020-21, a total of 1,116 places were funded in Specialist Resource Bases or special schools, while the wellbeing and speech and language classes had capacity for up to 48 primary learners on temporary placements and 90 places in the Pupil Referral Unit (PRU).
  24. Whilst there are a number of existing specialist settings across Cardiff, there are currently insufficient places available. This insufficiency of places compared to need is projected to increase over coming years.
  25. Owing to insufficient places in Cardiff maintained special schools, the Council has also funded some places at special schools maintained by other LAs, or in independent schools. In addition, the Council is responsible for funding additional support or specialist placement provided by other local authorities for children looked after who are placed out of area. The total spend on all 'out of county' provision, was £6.3m in 2020-21. The budget for 2021-22 is currently set at £7.3m.
  26. Spending on independent places and special school places in neighbouring local authorities has grown to c£3.8m in 2020/21, of which c£2.5m has funded places in specialist provision for those learners with



Emotional Health & Wellbeing Needs. Some of these may have been able to be placed at The Court if a greater number of places were available. Without investment in additional places, this figure would be expected to grow significantly in future years. To address the shortfall of places in the primary phase, the replacement and expansion of the existing Court buildings in 21<sup>st</sup> Century facilities would provide the best opportunities for learners and would represent a more efficient use of resources.

27. The cost to the Council of school transport for learners with Emotional Health & Wellbeing Needs to these placements averaged c£6,000 per child in 2018/19 (the most recent year pre-Covid restrictions). It is anticipated that replacement and expansion of the existing Court school would significantly reduce average transport costs per learner, as average journey lengths would reduce for those currently transported over longer distances to schools outside/further from Cardiff.

### **Primary Emotional Health and Wellbeing Needs provision (age 4-11)**

28. In 2020/ 2021 Cardiff maintains 42 primary special school places, and 40 places in primary Wellbeing classes, for children with emotional health and wellbeing needs. This will increase to a total of 90 in 2021/ 2022, as the Wellbeing Class at Lakeside Primary School is due to open 8 further places.
29. The primary Wellbeing Classes provide a temporary specialist placement for children at risk of exclusion or experiencing significant emotional difficulties. The pupils are dual registered, and are supported to reintegrate to their local school. This early intervention approach can help to prevent the escalation of needs, and reduce the risk that children will need placement in the special school. The Wellbeing Classes have reported good learning and wellbeing outcomes for pupils who have accessed the programme.
30. The Court Special School caters for children with more complex, long term needs who require a more permanent placement in a specialist setting.
31. Taking account of all children requiring such a placement, including those placed out of county, and in mainstream awaiting specialist placement, the demand for places is estimated to be circa 103 in 20/21, rising to 119 by 2025/ 2026. Allowing for a 10% surplus to support flexibility, capacity is required for 113 pupils in 20/21, and 131 pupils by 2025/ 2026.
32. In summary, there is an estimated provision gap of 31 places in 20/21, rising to 41 places in 2025/2026. The proposed expansion of The Court would provide 30 additional places, reducing this gap to 11 places.
33. This projection does not take account of a possible further increase in needs as an outcome of 'lockdown' measures during the COVID 19 pandemic. It is likely that further additional provision, focussed on early

intervention in Wellbeing Classes, will be needed over the next few years to address this issue.

### **Primary Complex learning/ autism provision (age 4-11)**

34. In 2020/21 Cardiff maintains 445 primary special school and specialist resource base places for children with complex learning needs or autism. Projects previously agreed by Cabinet, to extend and rebuild Riverbank Special School and to establish a Specialist Resource Base at Ysgol Pwll Coch, will increase the total to 524 places by 2025.
35. Taking account of all children requiring such a placement, including those placed out of county, and in mainstream awaiting specialist placement, the true demand for places is estimated to be circa 500 in 2020/ 2021, rising to 547 by 2025/ 2026.
36. Allowing for a 10% surplus to support flexibility, capacity is required for 550 pupils in 2020/ 2021, and 602 pupils by 2025/ 2026.
37. In summary, there is an estimated provision gap of 89 in 2021/ 2022, rising to 108 by 2024/25. If there were no further growth beyond current plans in relation to Riverbank Special School and Ysgol Pwll Coch, a provision gap of circa 78 places will remain in 2025/ 2026.
38. Additional information, regarding projections and forecasts and the methodologies used to establish likely demand are set out in Appendix 2.

### **Geographical distribution of specialist provision**

39. The location of Specialist Resource Bases and Wellbeing Classes is not well-distributed across the city. A specialist provision map showing location of existing provision is attached at Appendix 3.
40. The lack of Specialist Resource Bases in some localities can disadvantage learners living in those areas. For example, many schools in the 'southern arc' of the city report that families are unwilling to take up the offer of a Specialist Resource Base or special school place because they are unfamiliar with the areas where provision is located and/ or may lack the means to travel easily to those areas.
41. Although free home to school transport is available for such children, sending a young child to school in an unfamiliar area is a difficult decision for parents/ carers. A better distribution of specialist resource bases across the city would improve access for pupils, and reduced travel times for many pupils, as well as increasing the number of places available.
42. The cost of transport for children with Additional Learning Needs has increased significantly in recent years. Further increases are expected given the growth in the ALN population. However, a better geographical distribution of specialist provision would mitigate this increase through reduced journey times and distances.

## Summary of provision

43. The shortfall in provision has resulted in:
- Significant continued reliance on places in the independent sector.
  - Some learners remaining in mainstream school with support, contributing to the significant growth in the cost of mainstream statements.
  - A number of learners with highly complex needs who would be better placed in special schools, attending Specialist Resource Bases. While the bases have the expertise to meet the needs of these learners, the pupils themselves receive little benefit from placement in a mainstream environment and this over-reliance on specialist resource bases reduces the places available for learners who need and can benefit from a specialist resource base.
  - Increased risk of appeals to Tribunal.

## The Court Special School

44. The Court Special School is a 42 place school for city-wide learners aged 4-11 although the majority of placements are for children in Key Stage 2, aged 7-11. All of the children have significant emotional health and wellbeing needs (the PLASC designation is Behaviour Emotional and Social Difficulties – BESD although Cardiff avoids the use of this term as it tends to be shortened to ‘behaviour’ and can have a negative connotation).
45. All pupils enrolled at The Court School have a statement of special educational needs. The statutory assessment process for these young people has identified that their additional learning needs cannot be met in a less specialised environment.
46. The purpose of The Court School is to provide a specialist learning environment and curriculum, where learners can fulfil their potential.
47. Admission to the school is subject to a statement of Special Educational Need and is managed by the local authority, in line with the SEN Code of Practice for Wales, which will be replaced by the ALN Code from September 2021.

## Land Matters related to The Court School

48. The Council has identified the existing sites of Fairwater Primary School and St Mellons Church in Wales Primary School as the preferred sites for The Court, replacing the existing provision and operating over split sites.
49. Fairwater Primary School has a generous site of c4.8Ha and has been identified as of sufficient size to be shared with a new-build special school.
50. The current capacity of Fairwater Primary School is 239 places and the school had 210 children on roll in October 2020. The school has

sufficient classroom space to accommodate a greater number of pupils and has re-designated these rooms for other purposes. Whilst the number of pupils in year groups fluctuates significantly between 19 and 41 pupils, the school has been able to accommodate all applicants for admission at the time of the greatest intakes to primary schools. The school also accommodates a Wellbeing Class.

51. Although Fairwater Primary School makes full use of its site and buildings, the size and configuration of the site would support the development of a new special school and would still enable Fairwater Primary School to retain a site which exceeds the site size requirements of a large community primary school.
52. In January 2020, The Council determined proposals for St Mellons Church in Wales Primary School to transfer from its existing site at Dunster Road, Llanrumney, to a new school site on the St Edeyrn's development.
53. The current capacity of St Mellons Church in Wales Primary School is 116 places and the school had 107 children on roll in October 2020. The school's site of c0.46Ha is lies adjacent to the 2.2Ha site of Pen Y Bryn Primary School. St Mellons Church in Wales Primary School will vacate its existing site in summer 2022 and the Council will take responsibility for the site and buildings.
54. Each of these sites, and local infrastructure off-site, would support the development of special school provision. If, following consultation and further feasibility work on preferred options, the Council decided not to proceed with establishing a school on the St Mellons Church in Wales Primary School site, the Council would consider alternative uses for the site or could dispose of the site for a capital receipt.
55. It is anticipated that the existing site of The Court School would be disposed of for capital receipt at the end of the build programme.

### **Complex Learning Needs Specialist Resource Base**

56. A Specialist Resource Base is a small class in a mainstream school, taught by specialist staff.
57. There are five Cardiff primary schools currently hosting Specialist Resource Bases for complex learning needs at present. These are hosted by Ysgol Gymraeg Pwll Coch, Bryn Hafod Primary School, Llanedeyrn Primary School, Llanishen Fach Primary School and Marlborough Primary School.
58. All Specialist Resource Bases are open to admission from across the authority, although as far as possible, pupils are offered places in the Specialist Resource Bases closest to their home.
59. In addition to complex learning needs bases, there are 2 primary specialist autism resource bases, at Springwood Primary School and Lakeside Primary School, a speech and language class at Allensbank

Primary School and five primary Wellbeing Classes, hosted by Ysgol Gymraeg Pen y Groes, Fairwater Primary School, Springwood Primary School, Lakeside Primary School and Fitzalan High School.

60. The Specialist Resource Bases designated for complex learning provide two classes of up to 10 pupils; a class at Foundation Phase and a class at Key Stage 2. The pupils benefit from being taught in small classes with favourable pupil-staff ratios, taught by specialist staff. Pupils also benefit from opportunities to learn and socialise with their mainstream peers.
61. Admissions to the Specialist Resource Bases are managed by the Council, subject to a statement of Special Education Needs (SEN). Under the ALN Code, placement will be subject to an Individual Development Plan (IDP). The proposed capacity for 20 pupils would be in addition to the capacity of mainstream places in the school.
62. The opportunity to employ specialist staff and to work more closely with specialist services in Cardiff would enhance the school's capacity for inclusion and benefit all pupils in the school.
63. The provision of a Specialist Resource Base for complex learning at Moorland Primary School is proposed, to increase the number of places available to meet demand, and ensure that pupils living in the south central area of the city travel shorter distances to access specialist provision.

#### **Land matters relating to Moorland Primary School**

64. The Council is progressing works to replace early years accommodation at Moorland Primary School and to locate Flying Start provision on the site.
65. Early years provision for Moorland Primary School is located in a demountable unit at the rear of the school site. The unit has been rated as condition C. It currently accommodates 64 part-time Nursery places and 60 Reception class places.
66. This unit would be removed and a new building provided, accommodating the existing number of nursery class and Reception places.
67. Accommodation for the Specialist Resource Base would be provided as part of this planned work.
68. There is currently a boxing club located on part of the Moorland Primary School site. At present, the school redevelopment project is not reliant on the boxing club land. However, if this was to become available at a later date it would be beneficial to the school as it is a confined site.
69. The former Ysgol Glan Morfa school building is currently being appraised by the Council's housing department in relation to the delivery of Council

housing on the site. The proposals will seek to deliver a replacement new boxing club facility on the former Ysgol Glan Morfa site as part of the residential scheme to free up the land currently occupied by the boxing club for use by Moorland Primary School.

70. The Caretaker's house sits within the school footprint. This will be demolished as part of the project. There is no capital receipt to be realised associated with this as the land will be reallocated for the school's use.

### **Health provision**

71. The proposals to expand specialist provision at the above school sites will have implications for health and other specialist services, working in partnership with schools to meet Additional Learning Needs. An additional factor is the ALN Reform Act 2018, which will introduce new responsibilities for health, education and social care to work together to coordinate assessment and provision. The Act 2018 will be implemented over a three-year period, beginning in September 2020.
72. In order to address these challenges together, the local authority and Cardiff and the Vale University Health Board are undertaking a joint review of health and specialist provision in Cardiff special schools and pupil referral units. The findings of the review, overseen by a project group of representatives from health, education, social services, schools, and parents, will inform the design of the specialist provision.

### **Admissions Arrangements**

73. The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.

### **Impact of the proposal on the Welsh Language**

74. The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has been changing over the last 4-5 years, with schools reporting an increased incidence of ALN, in all areas of need.
75. A review of ALN in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with ALN leaving the Welsh-medium sector in order to access specialist resource bases or special schools.
76. There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English medium if their child has ALN, through concern that their child may need to transfer to the specialist sector at a later date.
77. Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to

generate more confidence in the availability of specialist provision in the sector.

78. A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.
79. In 2021 there is growing demand for resource bases for pupils with autism, who are average to high achievers, and would need a more integrative model of support than that provided by the two existing bases. There are currently 8 secondary aged learners, and 15 primary aged learners who would benefit from placement in an ASD base. This is a short term priority, given the risk that if current placements fail, the only option would be to offer a transfer to an English medium setting.
80. A primary wellbeing class has been established, hosted at Ysgol Gynradd Pen y Groes. The wellbeing class works flexibly to address needs in different age phases, or to provide an outreach model, depending on current need.
81. To support emotional health and wellbeing needs in secondary phase, a 'virtual' base/ PRU has been piloted across the three secondary schools, starting in 2018. The pilot is due for further review in 2021.
82. The priority is to ensure the three schools have adequate facilities and accommodation to provide effective Step 3 and 4 provision, complemented by the virtual base/ PRU. Medium term, the virtual base/ PRU will eventually need a fixed location at one of the schools, with designated accommodation, to reduce the risk that young people with the most complex needs may need to leave the Welsh sector to access more specialist provision.
83. As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex ALN.
84. The pool of ALN qualified and experienced teaching staff is limited in number, in comparison to the English sector. Any plan to develop Welsh medium specialist provision will need to be supported by an ALN Workforce Development Plan.
85. In accordance with the timetable set by Welsh Government, the Council is working closely with its partners on the Cardiff Welsh Education Forum to develop the new ten year WESP for the city. It is expected the plan will be available for public consultation in autumn 2021 before being submitted for approval to the Welsh Government in early 2022. The first ten year Plan will commence on 1 September 2022 and expire on 31 August 2032.

86. Consultation on the draft WESP will seek views on how best to grow Welsh-medium education and on how to meet the local targets set by Welsh Government, in order to inform future proposals. The WESP will set out how the Council will increase the provision of Welsh-medium education for pupils with additional learning needs.

### **Learner Travel Arrangements**

87. There are no plans to change the Council's transport policy for school children.
88. Any pupils affected by the proposals would be offered the same support with transport as is provided throughout Cardiff in line with the same criteria that apply across Cardiff.
89. The Council's transport policy for school children can be viewed on the Council's website [www.cardiff.gov.uk/schooltransport](http://www.cardiff.gov.uk/schooltransport).

### **Community Impact**

90. The following are taken into account when considering a proposal: Public Open Space, parkland, noise and traffic congestion. Officers will work with schools and any community group to make sure that proposals avoid negative impacts if possible.
91. The schools that might be affected by the proposals are existing schools. Some offer after school activities and some have community organisations offering services from the school. It is not thought that there would be a negative impact on any of these activities.
92. With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis. Welsh Government's aim for shared facilities in community-focussed school are to:
- Provide opportunities for the local community and sports organisations to participate in sport and physical activity for health improvement and development of their skills, particularly amongst low participant groups;
  - Operate in line with the national agenda for sport taking into account nationally adopted strategies;
  - Generate positive attitudes in sport and physical activity by young people and reducing the dropout rate in sports participation with age;
  - Increase the number of people of all ages and abilities participating in sport and physical activity including people with disabilities;
  - Use the facilities to encourage the range, quality and number of school sports club links and to stimulate competition that is inclusive of young people and adults;
  - Provide affordable access to the facilities and to be self-financing and cost neutral in the first instance, generating sustainable income for the school in the future.



93. The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.

### **Wellbeing of Future Generations**

94. In line with the Well-being of Future Generations Act Cardiff's Band B programme is committed to providing Local Schools for Local Children, together with encouraging use of sustainable modes to travel to schools, such as walking and cycling. Each School project takes into account key transport issues when they are being designed and the firm need to provide safer routes to encourage walking, cycling and other active travel modes to schools.
95. With the current investments in ICT across the city, student movements may be further reduced as mobile technology develops further allowing for flexible teaching methods. These have the potential to result in a more efficient Travel Plan and further contribute to the Council's targets to reduce its carbon emissions.
96. In order to maximise the long-term impact of this significant investment, any design taken forward for each school included in this proposal would be developed to ensure the delivery of high quality modern facilities that are able to respond to the current pupil populations needs and support the delivery of effective teaching and learning methods. They would also incorporate the flexibility to take account of changes depending on need as time progresses; such as changing demographics and pupil numbers, changing curriculum and changing types of pupil needs.

### **Local Member consultation (where appropriate)**

97. Additional learning needs provision is city-wide and members will be consulted as part of the public consultation.

### **Scrutiny Consideration**

98. The Children and Young People's Scrutiny Committee will consider this report on 13 July 2021. Any comments received will be circulated at the Cabinet meeting

### **Reason for Recommendations**

99. To meet demand for special school places for primary age learners with emotional health and wellbeing needs and complex learning needs.

### **Financial Implications**

100. This report outlines the request to proceed to public consultation on changes to ALN provision and schools intake within The Court and Moorland Primary Schools. Proceeding to consultation does not, in itself commit the Authority to future expenditure so there are no capital financial implications directly arising from this report. However, once a

final options paper is provided it will be necessary for a full financial evaluation to be undertaken. The aim of this will be to provide assurance that the scheme remains affordable once all relevant costs and contingencies for potential changes in delivery timescales have been incorporated.

101. The outline 21st Century Schools Band B Programme was approved by Cabinet in December 2017. At that time the overall value of the programme amounted to £284m, including the Court Special School project. The Welsh Government (WG) have not formally approved individual project budgets, but have given their in principle support to each project within Cardiff Council's programme.
102. The overall projected costs of the Court are included in the current Band B cash-flow forecast, to be funded through Welsh Government Grant (75%) and 21<sup>st</sup> Century Schools Invest to Save borrowing (25%). Any revenue costs in relation to these schemes, including capital financing costs will be funded through the SOP Revenue Reserve.
103. A capital receipts target of £25m is expected to fund part of the overall Band B programme. The source of these receipts has yet to be identified, but any site disposals resulting from building schools on new sites should be prioritised to fund Band B.
104. Financial implications in relation to the acquisition of the Ty Glas site are detailed in a separate cabinet paper and these should be considered in conjunction with these proposals.
105. This report sets out proposals that create additional school places in the ALN setting that will need to be funded from the existing delegated schools budget. This report highlights the high cost provision currently being incurred for this population of pupils either through Out of County Placements or enhanced CNE payments to mainstream pupils. Further work is required to identify the extent to which the additional costs identified can be covered by the savings in other costs without there being a significant pressure on overall school budgets.
106. The Moorland Early Years Unit is to be funded from WG Flying start grant of £1.3m, with remainder to be funded from the Education Asset Renewal budget. In order to ensure sufficient budget there will be a need to prioritise this scheme within the current asset renewal programme, with additional funding to be made available through the invest to save allocation of the schools capital budget.

### **Legal Implications**

107. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to provide sufficient school places for pupils of compulsory school age, including appropriate provision for pupils with special educational needs (or additional learning needs). Parents have a right to express a preference for the school they wish their child to attend under section 86 of the

School Standards and Framework Act 1998, but this does not provide a right to attend a certain school, as applications can still be refused where this would prejudice the provision of efficient education or the efficient use of resources.

108. A local authority can make school organisation proposals, including making 'regulated alterations' to a community school or a community special school, under sections 42-44 of the Schools Standards and Organisation (Wales) Act 2013. The proposals set out in the report constitute 'regulated alterations' and must be considered having regard to the provisions of the 2013 Act and the School Organisation Code 2018, which sets out factors to be considered in respect of different proposals, the statutory procedures, legal requirements and guidance.
109. Where an increase in a school's capacity is proposed, the Council must have regard to evidence of current or future need/demand in the area for additional places, with reference to the school's language category (and religious character / gender intake if applicable). The Code also includes specific factors to be considered in relation to proposals for the reorganisation of provision for Special Educational Needs (or Additional Learning Needs). Cabinet will need to be satisfied that all relevant factors are properly considered in relation to the proposals.
110. The Council is required, prior to publishing its proposals, to undertake a consultation on its proposals in accordance with section 48 of that Act and the School Organisation Code 2018. The recommendations seek authority to carry out that statutory consultation. Case law has established that the consultation process should:
  - (i) be undertaken when proposals are still at a formative stage;
  - (ii) include sufficient reasons and information for particular proposals to enable intelligent consideration and response;
  - (iii) provide adequate time for consideration and response; and
  - (iv) ensure that the product of consultation is conscientiously taken into account when the ultimate decision is taken.
111. The Schools Organisation Code sets out further detailed requirements and guidance in relation to the statutory consultation, including the requirement for publication of a consultation document (and the contents of that document), a minimum 42 days consultation period including at least 20 school days, and a list of statutory consultees, including parents, pupils, governing bodies, religious bodies, the Welsh Ministers and Estyn.
112. The proposals in this report highlight the need to undertake property transactions should matters proceed following consultation. It is expected that the detail of those proposals will be provided in a future report where they can be considered in detail at that time.
113. If the proposals are taken forward, the admission arrangements, including admission numbers and catchment areas, will need to be determined, following consultation, in accordance with the School

Admission Code and the Education (Determination of Admission Arrangements) (Wales) Regulations 2006.

114. In considering the proposals, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers and must be able to demonstrate how it has discharged its duty. An Equalities Impact Assessment should be carried out to identify the equalities implications of the proposed decision, including inequalities arising from socio-economic disadvantage, and due regard should be given to the outcomes of the Equalities Impact Assessment.
115. The Council must also be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards and consider the impact of its proposals upon the Welsh language.
116. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how the proposals will contribute towards meeting its well-being objectives (set out in the Corporate Plan). Members must also be satisfied that the proposals comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
117. Following the public consultation, the Council is required to issue a consultation report, setting out the issues raised by consultees and its response to those issues. At that stage, a further report is to be submitted to the Cabinet to decide how to proceed.
118. Further legal advice will be provided as proposals are progressed.

## **HR Implications**

### **The Court Special School**

119. There are significant HR implications arising from the proposal. Firstly, the proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansions. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework.

HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes. Where Governing Bodies have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school based staff on the school redeployment register. Secondly, the proposal includes the relocation of the Court School with the school proposed to operate dual site arrangements. This will require high levels of staff and trade union consultation; clear communication plans regarding the arrangements for the transition from one school site to another; in addition to staff involvement in the development of building specifications or designs.

### Moorland Primary School

120. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Specialist Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Specialist Resource Base will provide opportunities for school based staff on the school redeployment register.

### Transport Matters

#### Transport matters relating to The Court at the proposed Fairwater Primary School site

121. There are very good public transport links with several bus services a short walk from the school. Waun-gron Park rail station is approximately 0.75 miles (1.2km) from the school.
122. There is good walking route access to the school and good existing and proposed cycling links. Short term improvements due through the Ely Mill development with links via Cycleway 5 to the city centre. The Ely Trail runs along Bwlch Road immediately to the south of the site and continues to Cardiff Bay of varying standards: traffic-free/ on-road. Signed routes link through Canton to the centre with medium term improvements due for on-road light segregation cycle tracks.
123. A recent Transport Assessment for this site identified acceptable traffic impact due to a comparable (but larger) development.
124. Further various facilities for walking and cycling, including upgrading of the Bwlch Road crossing are proposed in the Fairwater area for another school project with provision due by late 2023. These would also improve walking and cycling access to/from Ely south of the railway line and river Ely and north east through Fairwater, Llandaff and the wider network.
125. The proposed location at the Fairwater Primary School site would give potential for a separate second access from the existing primary school access.

126. The development proposals may require a revised Transport Assessment which will confirm measures to be included as part of the application to maximise travel by sustainable modes and identify any further provision relating specifically to a proposal for The Court.
127. Learner Transport will need appropriate facilities for drop-off and pick-up.

Transport matters relating to The Court at the proposed St Mellons CiW Primary School site

128. There are good public transport links via Llanrumney & Countisbury Avenue and also from Newport Road which are within short walking distance for staff access. There is good walking route accessibility for local pupils and staff.
129. Cycleway 2 is planned along this section of Newport Road. A short-medium term future phase will replace the existing cycle lanes provision on this busy main road.
130. There are current parking issues outside the adjacent Pen Y Bryn Primary along Dunster Road. While the Transport team is monitoring the situation and reviewing the need for additional measures and parking controls outside all schools, the need for any additional measures outside the proposed site would be considered as part of that process.
131. The development proposals require a Transport Assessment which will identify measures to be included as part of the application to maximise travel by sustainable modes.
132. Learner Transport will need appropriate facilities for drop-off and pick-up.

Transport matters relating to Moorland School SRB

133. The proposed SRB on the site of Moorland Primary School would serve pupils in the south central area of Cardiff and so is well-placed given its relatively central location, proximity to public transport routes and facilities, and potential for active travel connections.
134. The development proposals require a Transport Statement which has already identified measures to be included as part of the application to maximise travel by sustainable modes.
135. Learner Transport will need appropriate facilities for drop-off and pick-up. As the site is very constrained, initial considerations suggest the use of the adjacent turning circle on the Singleton Road cul-de-sac along the western boundary of the site to provide a designated area. This is directly adjacent to the school building access and would provide suitable access from Learner Transport vehicles.
136. A review of parking and loading restrictions and the provision of a School Street on both the adjacent streets (including Moorland Road on the east

side of the site) would improve safety by deterring vehicle access, and reducing congestion and parking issues.

137. Further proposed school safety measures would include improvements to road crossings, and general improved facilities for pedestrians and cyclists, including along desire lines through Moorland Park.

### **Property Implications**

138. This report outlines a number of property actions with any decisions relating the development, acquisition or disposal of property in regards to these schemes to be undertaken in conjunction with Strategic Estates in accordance with the agreed asset management processes and delegated authorities.
139. With respect of St Mellons Church in Wales School, there will be the management of the handover and transfer of the asset to Education.
140. Strategic Estates are supporting Education on the funding of the Moorland School development through managing the disposal of the former Ysgol Glan Morfa site which adjoins the Moorland Primary site. This capital receipt is ring fenced towards the delivery of the Moorland School Nursery and we will ensure best value is achieved through the disposal process.

### **Equality Impact Assessment**

141. An initial Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society. This assessment will be reviewed after consultation.
142. A Statutory Screening Tool including Equality Impact Assessment is attached as Appendix 4.

## **RECOMMENDATIONS**

The Cabinet is recommended to

1. authorise officers to consult on proposals to:
  - Increase the capacity of The Court Special School from 42 to 72 places. The school would transfer to new build accommodation across two sites at Fairwater Primary School and the current St Mellons, CiW Primary School site in Llanrumney from September 2025.
  - Establish a Specialist Resource Base (specialist resource base) for up to 20 primary aged children with Complex Learning Needs (CLN) at Moorland Primary School from September 2022.
2. Note that officers will bring a report on the outcome of the consultation to a future meeting to seek authorisation as to whether to proceed to

publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Melanie Godfrey</b> Director of Education & Lifelong Learning
	9 July 2021

*The following appendices are attached:*

Appendix 1: Cabinet Report, 14 December 2017

Appendix 2: Projections and Forecasts

Appendix 3: Specialist provision maps showing location of existing provision

Appendix 4: Equality Impact Assessment



**CABINET MEETING: 14 DECEMBER 2017**

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**21<sup>ST</sup> CENTURY SCHOOLS CARDIFF COUNCIL'S BAND B  
PRIORITIES**

**REPORT OF DIRECTOR OF EDUCATION AND LIFELONG  
LEARNING**

**AGENDA ITEM: 4**

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**PORTFOLIO: EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR  
SARAH MERRY)**

**Reason for this Report**

1. To seek Cabinet approval for the priority schemes to be undertaken as part of Cardiff's Band B 21st Century Schools Programme.
2. To note the approval in principle by Welsh Government of the Strategic Outline Case submitted by Cardiff Council for Band B of the 21<sup>st</sup> Century Schools Programme and to authorise discussion with the Welsh Government to secure business case approval for individual schemes.

**Background**

3. At its meeting on the 12<sup>th</sup> of October 2017, the Cabinet received a report which outlined the challenges and opportunities facing Cardiff in the development of the education estate. This included:-
  - Sufficiency needs resulting from population growth.
  - Condition of the current school estate;
  - Suitability of the current estate to meet the demands of 21<sup>st</sup> century learning.
4. That report set out the Council's proposed vision for its Band B 21<sup>st</sup> Century School Strategy in that it was to deliver:

*"Inspiring, sustainable, community-focused schools in which children and young people can achieve their potential"*

5. This vision was to be realised through the achievement of four key educational aims that directly link to the Welsh Government's national programme objectives:-
  - Aim 1: To provide a sufficiency of school places across the city that are in the right place and are at the right size to enable the delivery of excellent education provision.
  - Aim 2: To provide high quality educational facilities that will meet the diverse requirements of the 21st Century.
  - Aim 3: To optimise the use of education infrastructure for the benefit of the wider community across Cardiff.
  - Aim 4: To ensure that Cardiff achieves best value from its resources to improve the efficiency and cost effectiveness of the education estate.
6. The report outlined the sufficiency, suitability and condition issues in Cardiff which provide the basis of the funding request from Cardiff to Welsh Government under the Band B programme. The Band B phase of the 21st Century Schools Programme will commence in April 2019 and is scheduled to run until 2024.
7. Funding was therefore required to enable the Council to address the following priorities:-
  - Remove all "D" condition, end of life, school properties;
  - Address the eight form of entry sufficiency issue in the English medium secondary sector in the central area of the city;
  - Address the sufficiency, condition and suitability issues in the special sector, in both primary & secondary settings;
  - Address local sufficiency issues in welsh medium primary schools in the east and west of the city;
  - Address local sufficiency issues in english medium primary schools in Cardiff Bay and west of the city.
8. It was agreed at this meeting that the proposed schemes for Cardiff under the Band B phase of the 21<sup>st</sup> Century School Programme would be the subject of a Cabinet report, once the budget allocation from Welsh Government was known.
9. The Cabinet Secretary for Education, Kirsty Williams, announced on 10 November 2017 that £2.3bn had been earmarked to modernise education infrastructure in Wales. The announcement confirmed that Welsh Government is committed to supporting projects submitted in the Outline Strategic Business Cases by local authorities and further education institutions, subject to the approval of business cases for specific schemes.
10. The value of the programme submitted by Cardiff Council was £284 million, of which half would be funded by Welsh Government, and half by the Council. Welsh Government have subsequently confirmed approval in principle of the programme envelope for this sum, subject to the

approval of individual project business cases. This report outlines the proposed schemes in Cardiff under this programme.

### **Proposed Band B Schemes**

11. The Band B submission for 21<sup>st</sup> Century funding can only seek to address the most acute sufficiency and condition issues in Cardiff. Using a detailed and robust methodology that was directly aligned to Welsh Government's Strategic Objectives for its 21<sup>st</sup> Century School Programme, a prioritisation matrix was developed to identify those schools in the most need of investment. All properties across the school estate were given a rating from A to D for the following issues, with D being the worst category:
  - Sufficiency of places available;
  - Condition of the school buildings;
  - Suitability of the environment for teaching.
12. The sufficiency ratings for all schools were prepared using the corporate population database and projection methodology used for the planning of school places. The condition and suitability rating were prepared independently, using Welsh Government approved methodology via independent specialist.
13. Welsh Government is committed to removing all "D" condition schools from Wales. Any schools that are classified as "D" category for condition should be automatically prioritised for investment under Band B.
14. Any project to increase the size of a school establishment, change its configuration or location will require statutory consultation and Cabinet determination. The statutory consultation would set out the detailed proposals and proposed location for each scheme. It would also indicate whether there were any proposed co-locations with other educational establishments. It is important that these are considered in full, alongside any collaborative opportunities, in order to optimise the economies and educational benefits that can be delivered from the projects. It is anticipated that any statutory consultation on the matters in this report this would commence during the spring of 2018.
15. It should be noted that because of the scale and number of proposed projects in the Band B investment programme, the delivery of the schemes will be undertaken in batches over the timespan of the programme commencing in 2019. As a result of the phasing, it may be necessary to put interim measures in place where sufficiency issues arise before new schools with increased capacity can be delivered.

### **Secondary schools - proposed Band B schemes**

16. To address the eight form of entry sufficiency issue that is forecast in the central area of the city from 2019, schemes affecting five English medium schools are proposed. Three of these secondary schools are also

catergorised as being in “D” Condition, ie. at the limit of planned lifespan. The schemes are as follows:

### **Cantonian High School**

17. It is proposed that Cantonian High School is rebuilt and expanded to provide a new 11-18 high school, with eight forms of entry (8FE). This is a two form of entry expansion, or 60 places per year (+2FE). This will address “D” condition categorisation and address the “D” rated sufficiency issues within the local catchment. It includes an expansion of post 16 by 55 places to 150 places.

### **Fitzalan High School**

18. It is proposed that Fitzalan High School is rebuilt as a new 11-18 high school, with ten forms of entry (10FE). This will address the “D” condition categorisation and “D” categorised sufficiency issues in the local area.

### **Willows High School**

19. It is proposed that Willows High School is rebuilt and expanded to provide a new 11-16 high school, with eight forms of entry (8FE). This is a two form of entry expansion, or 60 places per year (+2FE). This will address “D” condition categorisation and address the “D” rated sufficiency issues within the local catchment.

### **Cathays High School**

20. It is proposed that Cathays High School is rebuilt and expanded to provide a new 11-18 high school, with eight forms of entry (8FE). This is a two form of entry expansion, or 60 places per year (+2FE). This will address “C” condition categorisation and address the “D” rated sufficiency issues within the local catchment.

### **Cardiff High School**

21. It is proposed that Cardiff High School is expanded and remodelled to provide an 11-18 high school, with ten forms of entry (10FE). This is a two form of entry expansion, or 60 places per year (+2FE). It will address a “D” category sufficiency issue and remodelling and refurbishment works will address the “C” condition rating.

### **Special Schools - proposed Band B schemes**

22. Four special schools have been ‘D’ rated for suitability and are in need of replacement:
  - Riverbank School, for children aged 4-11 with severe and complex learning disabilities
  - Woodlands School, for pupils aged 11-19 with severe and complex learning disabilities

- The Court School for children aged 4-11 with emotional health and wellbeing needs also commonly referred to as 'behavior emotional and social needs.
  - Greenhill School for pupils aged 11-16 with emotional health and wellbeing needs.
23. However, the sufficiency issues in relation to additional learning needs (ALN) are not limited to the areas of need currently served by these four schools. Cardiff is anticipating a significant increase in the need for special school places for children and young people with:
- profound and multiple learning disabilities
  - autism spectrum conditions
  - severe and complex learning disabilities
  - emotional health and wellbeing needs
24. Sufficiency issues are also not limited to the populations currently served by the special schools. Cardiff lacks:
- suitable provision for secondary aged girls with emotional health and wellbeing needs
  - suitable provision for post-16 pupils with emotional health and wellbeing needs, who are not yet ready for transition to college or employment
25. The Council recognises that special schools are more than providers of education: at their best, they provide a locus for multi-agency assessment, planning and support. The multidisciplinary potential of special schools is of increasing importance in light of the Social Services and Wellbeing Act (date) and the Additional Learning Needs and Education and Tribunal Bill, both of which set out statutory responsibilities for agencies to follow a person-centred approach, with the child and their family at the heart of the process, and to implement a single unified plan to promote positive outcomes in relation to health, social care and education.
26. Special schools also play an important role in providing support, information and training for families and for mainstream schools.
27. Band B special sector schemes will therefore be required to deliver on several interconnected goals:
- to replace the 'D' rated accommodation at the four schools named in paragraph 22;
  - to increase capacity across the four areas of need identified in paragraph 23;
  - to address the gaps in provision identified in paragraph 24;
  - to enhance opportunities for multi-agency support and provision;
  - to enhance the role of special schools as a source of support for families and for mainstream schools.

28. The four capital schemes described below will provide a number of different options for re-shaping special school provision in Cardiff in line with these goals. They should not be regarded as 'rebuild and replace' projects, affecting only the four named schools, but as opportunities to review the pattern of provision across the seven special schools in Cardiff.
29. The Council will therefore work with our stakeholders including schools, health, and social services, to shape and appraise the options for reshaping special school provision in Cardiff.

**Primary special school: complex learning disabilities and autism spectrum conditions**

30. It is proposed to build a new 140 place primary special school, for children with severe and complex learning disabilities and children with autism spectrum conditions.
31. This project will enable the council to address the unsuitable accommodation currently used by Riverbank School, and to address sufficiency issues in relation to severe and complex leaning needs and autism spectrum conditions at primary phase.
32. In shaping options for this project, the implications for the respective roles and remit of Ty Gwyn, Riverbank and The Hollies Schools, and for health services that work with the schools, will need to be considered.

**Secondary special school: complex learning disabilities and autism spectrum conditions**

33. It is proposed to build a new 240 place secondary special school for pupils with severe and complex learning disabilities and pupils with autism spectrum conditions.
34. This project will enable the council to address the unsuitable accommodation currently used by Woodlands School, and to address sufficiency issues in relation to severe and complex leaning needs and autism spectrum conditions at secondary phase.
35. In shaping options for this project, the implications for the respective roles and remit of Ty Gwyn, Woodlands, the Marion Centre and for health services that work with the schools, will need to be considered.

**Primary special schools: emotional health and wellbeing needs**

36. It is proposed to build a new primary special school, for children with emotional health and wellbeing needs.
37. This project will enable the council to address the unsuitable accommodation currently used by The Court School, and to address sufficiency issues in relation to emotional health and wellbeing needs at primary phase.

38. The planned place number for this project is 48, but it is yet to be determined whether all of these places should be on a single discrete, special school site, or whether some classes should be based on mainstream school sites, operating as special school 'outreach classes', to enhance the opportunities for children with emotional health and wellbeing needs to maintain links with mainstream education, and to make a successful reintegration if appropriate.

### **Secondary special school: emotional health and wellbeing needs**

39. It is proposed to build a new secondary special school, for pupils with emotional health and wellbeing needs. This project will enable the council to address the unsuitable accommodation currently used by Greenhill School, and to address sufficiency issues in relation to emotional health and wellbeing needs at secondary phase.
40. The planned place number for this project is 112, but these places will be provided on 2 separate sites to ensure the number of vulnerable young people educated on one site does not exceed 56. The project will address the need for designated provision for girls, and for young people post-16 who are not yet ready to transfer to college or employment.
41. The Council will continue to develop collaboration between education and social services, and with Cardiff and the Vale University Health Board, to develop a more holistic approach to therapeutic support for vulnerable learners and their families.

### **Primary Schools - proposed Band B schemes**

42. Four primary schemes that have been prioritised for investment within Band B. These include two English medium and two Welsh medium schools. This will address localised sufficiency issues that will present within the catchment areas within the timescale of the Band B investment. These four primary schools are:

#### **St Mary the Virgin Primary School**

43. It is proposed that St Mary the Virgin Primary School is replaced with a new school and its capacity increased by 30 places per year to a two form of entry school (2FE). This will address projected English-medium sufficiency issues in Grangetown/Butetown area, along with addressing additional pupil yield generated from a number of new housing developments that have gained approval. This scheme was deferred from the Band A Investment programme.

#### **Fairwater Primary School**

44. It is proposed that Fairwater Primary School is enlarged and its capacity increased by 30 places per year to establish a two form of entry school (2FE). This will address projected English-medium sufficiency issues in its catchment area, along with addressing additional pupil yield

generated from a number of new housing developments that have gained approval.

### **Ysgol Pen y Pil**

45. It is proposed that Ysgol Pen y Pil is enlarged and its capacity increased by 30 places per year to a two form of entry school (2FE). This will address projected shortfall in Welsh-medium primary school places in the east of Cardiff.

### **Ysgol Gymraeg Nant Caerau**

46. It is proposed that Ysgol Gymraeg Nant Caerau is enlarged and its capacity increased by 30 places per year to a two form of entry school (2FE). This will address projected shortfall in Welsh-medium primary school places in the south west of Cardiff.

### **Maximising investment for community benefit**

47. Educational assets are a vital investment into the heart of a community. Significant investment in school should actively contribute a wide variety of benefits to the local area.
48. To date, the Council has ensured that all its new facilities are accessible to the local community. New facilities are designed in such a way to allow extended use of all the facilities, whether internal such as main hall, dance or recording studios or external facilities such as MUGA's and 3G sports pitches.
49. The Council seeks to maximise community benefits wherever possible, including benefits for children and young people, through its procurement practices. The Council has explicitly identified this as one aspect of its programme to promote children's rights, as a participating member of the UNICEF Child Rights Partner Programme. This commitment will be reflected in any tender documentation, on a project-by-project basis.
50. In line with Welsh Government guidelines on Community Benefits, the Council will strive to meet the benchmark targets through the delivery of Band B 21st Century Schools programme. These will build stronger communities and in turn develop the local economy to reduce social exclusion and poverty in deprived areas.
51. Delivery of Community Benefits is overseen by a Community Benefits Board, which was established in January 2017. The role of the Board is to co-ordinate the social value agenda across Cardiff Council and maximise the community benefits delivered. The Board includes senior managers from across the Council and meets on a quarterly basis.

### **Indicative Cost of Programme and Funding Options**

52. The indicative cost of the Council's outline Band B programme is £284 million, based on standardised construction cost rates as provided by



Welsh Government. This total cost represents the full “rolled-up” cost of all schemes within the preferred programme. External cost consultants have confirmed that delivering the programme should be possible within the overall envelope identified. As schemes progress, it is felt that it will be possible to identify further efficiencies and various cost-saving measures to ensure that the overall cost envelope is not exceeded.

53. The Welsh Government’s funding model requires the Council to match fund 50% of the total capital cost, with the Welsh Government contributing the other 50% in the form of capital grant. Therefore, the Council will be required to identify capital funding totalling £142 million. In line with the approach taken to Band A, this funding will predominantly take the form of external prudential borrowing and any available capital receipts. External borrowing will give rise to revenue expenditure in the form of capital financing costs and, therefore, the Council will be required to identify revenue funding sources to meet those costs.
54. In addition to the traditional funding model that Band A was predicated on, the Welsh Government made an additional option available to local authorities as part of Band B, known as the Mutual Investment Model (MIM). MIM is a revenue funded option and is based on a 75:25 cost sharing arrangement in the favour of local authorities. The basic premise of the model is that any new schools created would be funded through the private sector through Special Purpose Vehicles, in which Welsh Government would be represented, and local authorities would lease the assets created over a period of 25 years. As such, local authorities would pay an annual lease payment for use of the new school facilities, rather than incurring the up front capital costs associated with constructing and then owning the facilities. The Welsh Government’s proposal would be to provide revenue funding towards 75% of the annual lease payments for the 25 year period. At the end of the 25-year period, the assets would transfer over to the respective local authorities.
55. The Council reviewed the options available, particularly the MIM option, using example information provided by Welsh Government. In doing so, the Council decided to express an interest in the traditional capital funding model only, when submitting its Strategic Outline Business Case. This followed consideration of the overall cost of MIM, the Welsh Government’s proposed contribution rate and the overall level of risk exposure. As such, the intention is that the £284 million programme, if fully approved, will be funded on the traditional capital grant model basis. The final confirmation of funding anticipated from Welsh Government is expected to be on the basis of the traditional model.

### **Local Member Consultation**

56. Any proposals to increase the size of an educational establishment, change its configuration or its location would require statutory consultation. Such consultation would include local members, and would follow publication of detailed proposals and proposed locations.

## **Reason for Recommendations**

57. To approve the schemes that have been prioritised for investment under the Band B phase of the 21<sup>st</sup> Century School programme/

## **Financial Implications**

58. The recommendations to this report do not themselves commit the Council to any capital expenditure commitments and, therefore, there are no capital financial implications directly arising from this report. However, the report outlines a potential capital programme totalling £284 million, the financial implications of which will be significant. External borrowing totalling a maximum of £142 million would result in significant annual revenue capital financing costs and funding sources would need to be identified in order to meet the expenditure commitments resulting. The significance of these commitments necessitate the need for consideration as part of the wider Council budget process and, therefore, the preferred funding solution will form part of the annual budget report presented to Cabinet and Council in February 2018.
59. In addition to the capital, and consequent revenue, funding implications arising from the Band B programme, revenue expenditure in relation to programme management, school transition and business case development will also arise. These costs will also form part of the funding considerations made as part of the Council's annual budget process. However, Recommendation 2 to this report, which highlights the need to progress initial business case development, may result in the need to incur revenue costs in the form of external advice prior to February 2018. It is anticipated that it will be possible to fund these costs from within the current SOP Revenue Reserve, set aside for revenue costs arising from the current 21<sup>st</sup> Century Schools Band A programme and other school organisation projects.

## **Legal Implications**

60. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to consider parental preference which includes preference for Welsh medium education. The Council also has obligations under the School Standards and Framework Act 1998 and School Funding Regulations 2010 to provide capital funding for maintained schools.
61. Section 84 and 85 of the School Standards and Organisation (Wales) Act 2013 and the Welsh in Education Strategic Plans and Assessing Demand for Welsh Medium Education (Wales) Regulations 2013, set out the statutory obligations for all local authorities to prepare, submit, publish and revise Welsh in Education Strategic Plans (WESPs).
62. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of

opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are:

- Age
- Gender reassignment
- Sex
- Race – including ethnic or national origin, colour or nationality
- Disability
- Pregnancy and maternity
- Marriage and civil partnership
- Sexual orientation
- Religion or belief – including lack of belief

63. The Council also has to consider its obligation under section 88 and schedule 10 of the Equality Act 2010 to prepare and implement an accessibility strategy. The strategy should increase disabled pupils' access to the curriculum and improve the physical environment and the provision of information.
64. The report identifies that the Equality Impact Assessment has been completed. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language, the report and Equality Impact Assessment deals with all these obligations.

### **HR Implications**

65. HR People Services will work with the Governing Body of all schools within Band B on any HR matters arising from the expansion of individual schools. In line with the SOP HR Framework, the Headteacher and the Governing Body of the schools concerned will be encouraged in to undertake a review of their staffing structure and assess the workforce requirements required for the increase in pupil numbers. This will have to be balanced against the forecasted school budget. However, it is likely that the permanent expansion schools within Band B will result in the creation of new posts in each of the schools concerned.
66. HR People Services will also provide support for the additional recruitment. This will take into account the School Redeployment and Redundancy Policy and Procedure whereby new posts may provide opportunities for any school based staff on the school redeployment register at that particular time.

### **Equality Impact Assessment**

67. An Equality Impact Assessment for the 21<sup>st</sup> Century Schools Band B Programme has been carried out. The assessment concluded that the programme would not adversely affect a particular group in society. Any proposals brought forward following this report would be subject to

further equality impact assessments including an assessment on any changes to accommodation. (Details of the Equality Impact Assessment can be seen at Appendix 1).

### **Sustainability Assessment**

68. A Strategic Environmental Assessment (SEA) of the proposal has been carried out in accordance with European Legislation. The assessment confirms that the proposal is compatible with the Council's 'What Matters' strategy which seeks to deliver 7 strategic outcomes. Any proposals brought forward following this report would be subject to an environmental assessment which would be carried out as part of the planning application process. (Details of the Sustainability Assessment can be seen at Appendix 2).

### **Transport Matters**

69. High level transportation issues have been reviewed for the sites in question to ensure that consideration is given to the ability of the potential locations to support Active Travel, in terms of pedestrian and cycle access to the sites.
70. All new developments will require a Transport Assessment to be undertaken, this will determine whether any changes are deemed necessary to the immediate highway network to enable pupils and staff to access the schools using Active Travel modes. All schools within Cardiff are also encouraged to develop robust Travel Plans which will help them address issues relating to how their staff and pupils travel to school, with the emphasis on encouraging and promoting Active Travel such as walking and cycling.
71. Any highway improvement works identified from the Transport Assessments will have to be funded and delivered as part of the 21<sup>st</sup> Century Schools Programme.

### **Community Impact**

72. The Welsh Assembly Government School Organisation Code 2013 requires local authorities to conduct a Community Impact Assessment and a Welsh Language Impact Assessment when proposing changes to school organisation.
73. The following are taken into account when developing proposals
- Public Open Place/parkland
  - Noise and traffic congestion
  - School designation
  - School links to the local community
  - Impact on parents and families
  - Travelling implications for pupils/families
  - Impact on community activities, impact on community facilities

74. Any proposals brought forward following this report which would be subject to public consultation would include a full assessment of any community impact.

**RECOMMENDATIONS:**

The Cabinet is recommended to:

1. Approve the prioritised schemes under Band B of the 21<sup>st</sup> Century Schools Programme.
2. note the approval in principle of Cardiff Council's Band B Strategic Outline Case by Welsh Government and to authorise the Director of Education and Lifelong Learning to secure Welsh Government approval in principle for the schemes within the programme.
3. note that a subsequent report to Cabinet will propose arrangements to secure sufficient capacity and appropriate governance in order to deliver the Cardiff Band B 21<sup>st</sup> Century Schools Programme.

**NICK BATCHELAR**

Director of Education & Lifelong Learning  
8 December 2017

*The following Appendices are attached*

Appendix 1 - Equality Impact Assessment  
Appendix 2 - Sustainability Assessment

## Projections and Forecasts

### Projection methodology for existing and new schools

Cardiff employs a robust projection methodology for planning school places which takes account of NHS GP registration data and school census data (PLASC) submitted by and verified by all Cardiff schools. As projections can only take account of historic and current information the Council also identifies trends within projections, and analyses school preference data and other contextual information to produce forecasts on a city wide basis and in each locality.

Data analysis allows projections to be prepared based on localised patterns at primary school catchment area level, by secondary school catchment area and on a city-wide basis. Each of these provide differing contextual information to inform the forecasting on the number of places that may be needed to meet the requirements of each area and of Cardiff as a whole. Specialist provision is considered on a city-wide basis.

### Forecast methodology for specialist provision

The determination of future ALN provision requirements based on historical trends adds additional complexity to population projections. Data analysis must additionally take into account:

- Cohort size: ALN numbers being a small fraction of the total population are therefore prone to significantly greater percentage fluctuation
- Need identification: The identification and categorisation of primary need has been a developing process such that it is challenging to establish a pattern of requirement against a common frame of reference for each need type.
- ALN placement: Pupils with significant additional learning needs can be placed in a wide variety of settings both in and out of county, and in both LA and independent facilities. The Pupil Level Annual School Census which forms the basis of pupil population projections in Cardiff therefore does not clearly capture the full range of ALN needs.
- Effects of covid-19: Historical patterns do not capture the increase in needs that is likely to have been caused by measures to mitigate the effects of the covid-19 pandemic.
- LDP: The population data capture in 2019 (PLASC) would not be able to capture future build rates of housing building on the strategic sites and hence patterns of occupancy
- Children and young people may not need specialist provision throughout their school career- some pupils succeed in mainstream for several years before they need to transfer to a specialist setting; others may make sufficient progress in a specialist setting to be able to return to a local mainstream school. The age at which pupils may need to access specialist provision therefore varies and cannot be precisely predicted.
- As a capital city, hosting the Children's Hospital for Wales and a range of special schools, Cardiff experiences a high number of new arrivals each year who require to go directly into a special school. In 2019-20 the number of new arrivals with this level of need was 18: in special school terms, this was the equivalent of 2-3 new classes that needed to be provided.

As limited historical data is available, ALN projections have therefore been predicated on an extensive data capture exercise undertaken in 2019 to identify the need type and number of Cardiff resident pupils, and evaluated as a percentage of the verified PLASC 2019 dataset. Demand has then been projected based on an estimated annual growth of ALN pupils of 0.05% of the whole pupil population, from the baseline established in 2019.

## Emotional Health & Wellbeing

It has been estimated that EHW pupils make up around 40% of pupils with complex ALN in Cardiff which corresponds to a projected growth of 0.02% per annum. In order to mitigate the risk of under provision and to allow for flexibility in the system, a further 10% uplift has been applied.

Table 1 sets out EHW Primary provision currently available in Cardiff and projected future demand.

Primary places	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
The Court	42	42	42	42	42	42
Fitzalan WBC	8	8	8	8	8	8
Fairwater WBC	8	8	8	8	8	8
Springwood WBC	8	8	8	8	8	8
Lakeside WBC	8	16	16	16	16	16
Pen y Groes WBC	8	8	8	8	8	8
<b>Total capacity</b>	<b>82</b>	<b>90</b>	<b>90</b>	<b>90</b>	<b>90</b>	<b>90</b>
Projected demand	103	107	110	112	116	119
Projected demand (+10%)	113	118	121	123	128	131
Surplus / deficit	-31	-28	-31	-33	-38	-41

## The ALN Provision Gap in Primary- Emotional Health and Wellbeing Needs

In 2020/21 Cardiff maintains 82 primary special school and Wellbeing Class places for children with SEMH needs. This will increase to 90 in 21/22, as the Wellbeing Class at Lakeside is due to open 8 further places.

Taking account of children out of county, and in mainstream awaiting specialist placement, the demand for places is estimated to be circa 103 in 20/21, rising to 119 by 25/26. With a 10% tolerance to allow flexibility, the ideal position would be 113 places in 20/21, and 131 places by 25/26.

In summary, there is an estimated **provision gap of 31 places in 20/21**, rising to **41 places** in 25/26.

This projection does not take account of a possible further increase in needs as an outcome of 'lockdown' measures during the COVID 19 pandemic. It is likely that further additional provision, focussed on early intervention in Wellbeing Classes, will be needed over the next few years to address this issue.

### Complex Learning Needs

Future demand projections were based on the 2019 ALN data captured and normalised against the verified PLASC 2019 survey.

Table 5 sets out Primary CLN provision currently available in Cardiff and projected future demand.

<b>Primary places</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>
Ty Gwyn*	75	90	90	90	90	90
Riverbank	70	70	70	70	70	112
Meadowbank	41	50	50	50	50	50
Hollies	112	112	112	112	112	112
Bryn Hafod	20	20	20	20	20	20
Llanederyn	20	20	20	20	20	20
Llan Fach	20	20	20	20	20	20
Marlborough	20	20	20	20	20	20
Springwood	28	28	28	28	28	28
Pwll Coch	7	10	15	20	20	20
Pentrebane	24	24	24	24	24	24
Allensbank SLCN	8	8	8	8	8	8
<b>Total places</b>	<b>445</b>	<b>472</b>	<b>477</b>	<b>482</b>	<b>482</b>	<b>524</b>
Projected demand	500	510	515	522	536	547
Projected Demand (+10%)	550	561	567	574	590	602
Surplus / deficit	-105	-89	-90	-92	-108	-78

### The ALN Provision Gap in Primary- Complex learning/ autism

In 2020/21 Cardiff maintains 445 primary special school and SRB places for children with complex learning/ autism. Projects previously agreed by Cabinet, to extend and rebuild Riverbank Special School and to establish an SRB at Ysgol Pwll Coch, will increase the total to 524 places by 2025.



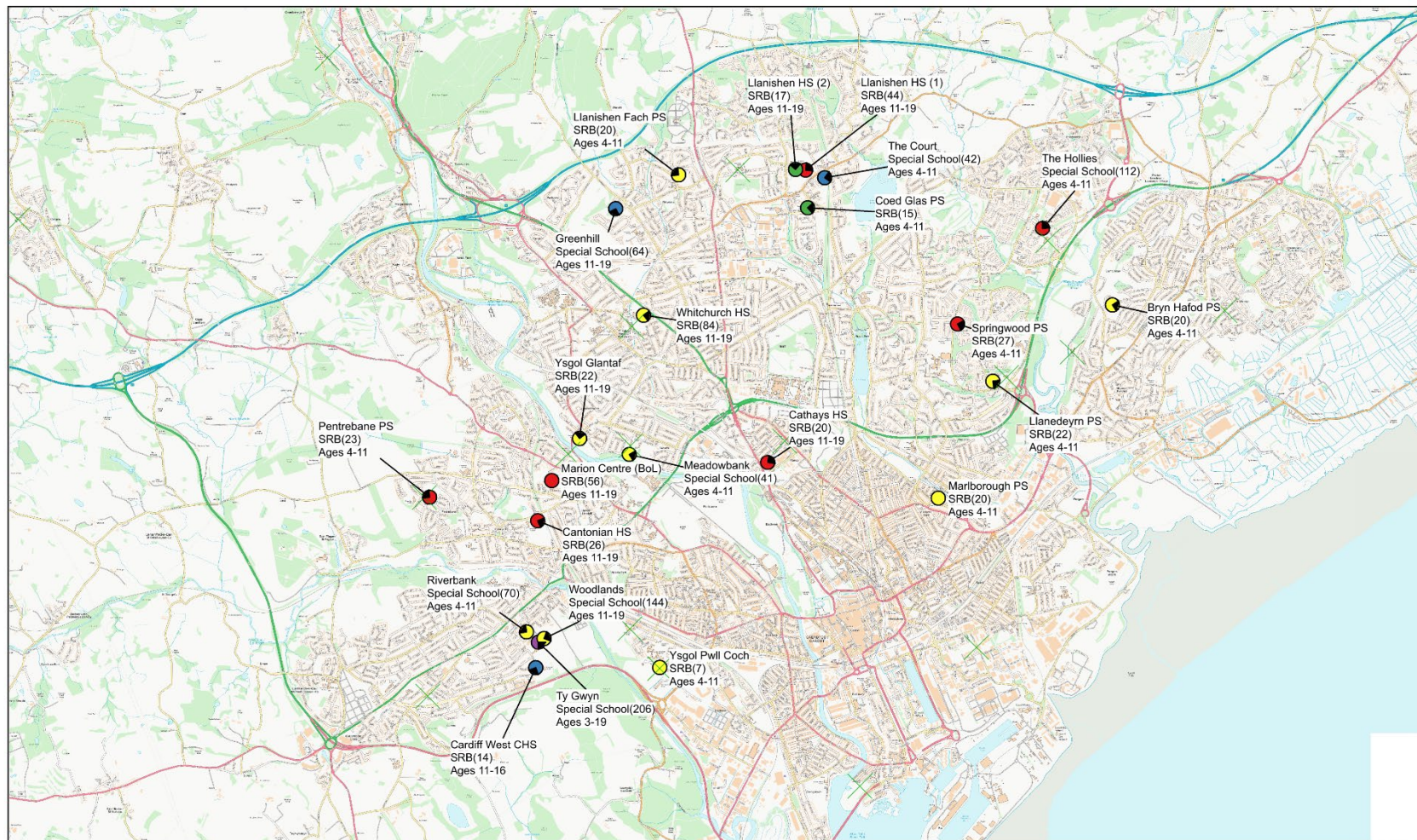
Taking account of children out of county, and in mainstream awaiting specialist placement, the true demand for places is estimated to be circa 500 in 20/21, rising to 547 by 25/26. With a 10% tolerance to allow flexibility, the ideal position would be 550 places in 20/21, and 602 places by 25/26.

In summary, there is an estimated provision gap of 89 in 21/22, rising to 108 by 2024/25. If there were no further growth beyond current plans in relation to Riverbank and Pwll Coch, a provision gap of circa 78 places will remain in 25/26.

NB The projections have been calculated to take account of a falling birth rate in Cardiff over the last 3 years. However, to date, the Inclusion Service has not seen a fall in the incidence of complex needs in the 0-3 age group, referred to Education by Health. 35 extra primary places p.a. were needed in 2020 and 2021. If growth continues at this rate, 140 extra places will be needed over next 4 years.

Map showing the current distribution of Special Schools and Special Resource bases in Cardiff

Cardiff Special Schools/SRBs 2021



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**Current special schools & SRBs: Type & Capacity**

- Autism (7)
- Behavioural, Emotional & Social Needs (3)
- Hearing Impairment (2)
- Profound & Multiple Learning Disabilities, Medical Needs, Autism (1)
- Severe Learning Disabilities, Medical Needs, Speech and Language, Autism (10)

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Equality Impact Assessment  
Corporate Assessment Template



Appendix 4

<b>Policy/Strategy/Project/Procedure/Service/Function Title: School Organisation Planning: Provision for children and young people with Additional Learning Needs (ALN)</b>
<b>New/Existing/Updating/Amending: Pre consultation</b>

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Richard Portas	Job Title: Programme Director
Service Team: Schools Programme	Service Area: Education
Assessment Date: June 2021	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

<p>To enable the Cabinet to consider recommendations to hold public consultation on proposals to transfer, expand and redevelop The Court Special School in line with Band B 21<sup>st</sup> Century Schools priority scheme and the establishment of specialist resource provision at Moorland Primary School.</p> <p>It is proposed to:</p> <ul style="list-style-type: none"> <li>• Increase the capacity of The Court Special School from 42 to 72 places. The school would transfer to new build accommodation across two sites at Fairwater Primary School and the current St Mellons, CiW Primary School site in Llanrumney with 36 pupils on each site from September 2025.</li> <li>• Establish a Specialist Resource Base (SRB) for primary aged children with Complex Learning Needs (CLN) at Moorland Primary School from September 2022.</li> </ul>
--

**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

<p>At its meeting on 14 December 2017, the Cabinet approved the prioritised scheme under Band B of the Cardiff's Band B 21st Century Schools Programme.</p> <p>The Band B Programme seeks to address the most acute sufficiency and</p>
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## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

condition issues in Cardiff. Four special schools are identified for redevelopment: Riverbank Special School and Woodlands High School, for pupils with complex learning needs/ autism, and The Court School and Greenhill School, for pupils with emotional health and wellbeing needs.

Proposals in relation to Riverbank and Woodlands were agreed by the Welsh Minister on 21 July 2020. This paper sets out the proposals in relation to The Court School. A copy of the 14 December 2017 Cabinet Report is included at Appendix 1.

Places for pupils with Complex Learning Needs (CLN) are offered in a range of settings across Cardiff which support identified pupil needs. This includes supported placements at both primary and secondary level in mainstream school and places in specialist resource base (SRBs) and special schools.

At present, both primary and secondary schools in Cardiff host specialist resource base provision. Some are designated to support children with complex learning needs who require a specialist curriculum taught in a small class environment; some are designated for learners with autism or hearing impairments who require specialist support to access mainstream learning, with access to a nurturing base for some learning and unstructured time.

The purpose of a SRB designated for complex learning is to enable learners with severe learning difficulties to succeed in a mainstream school environment. Pupils are taught in a small class by specialist staff and benefit from a specialist curriculum, while benefiting from the full range of education opportunities available to all pupils at the school.

The number of children requiring specialist placement as a result of their complex learning disabilities has been increasing in Cardiff over the last 5 years, and steps were taken in 2018 to increase the number of specialist places available.

A review of cases of children aged 0-3 with ALN, known to the Council, confirms that the number of children with complex needs admitted to Reception year will continue to grow in coming years despite a fall in total school intakes.

Band B projects to expand special school places at Riverbank and Woodlands Special Schools are underway, but further work is needed to increase resource base provision in the short term to increase the range of options for learners with complex learning needs.

The majority of resource base places are currently located in the north and east of the city. To improve access to resource base places for children living in the central south areas of the city, it is proposed to establish a base at Moorland Primary School.

**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

**3 Assess Impact on the Protected Characteristics**

**3.1 Age**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	X		
18 - 65 years	X		
Over 65 years	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The impact will be positive as the proposals will support the sufficiency of places in high quality learning environments in specialist provision.

This provision is age dependent and therefore not accessible to pupils outside of this age range, or adults, either locally or in the wider community.

The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

If the proposal were to proceed, an equality impact assessment would be carried out to identify the accessibility of the new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

**3.2 Disability**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment		X	
Physical Impairment		X	
Visual Impairment		X	
Learning Disability	X		
Long-Standing Illness or Health Condition		X	
Mental Health		X	
Substance Misuse		X	
Other		X	

**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The impact will be positive as the proposals will support the sufficiency of places in high quality learning environments in specialist provision.  The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.
<b>What action(s) can you take to address the differential impact?</b>
If the proposal were to proceed, an equality impact assessment would be carried out to identify the accessibility of the new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)			X

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.  The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.
<b>What action(s) can you take to address the differential impact?</b>
The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.4. Marriage and Civil Partnership**

**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.

**What action(s) can you take to address the differential impact?**

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.5 Pregnancy and Maternity**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			X
Maternity			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.

**What action(s) can you take to address the differential impact?**

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.6 Race**

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A

**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

White			X
Mixed / Multiple Ethnic Groups			X
Asian / Asian British			X
Black / African / Caribbean / Black British			X
Other Ethnic Groups			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.

The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			X
Christian			X
Hindu			X
Humanist			X
Jewish			X
Muslim			X
Sikh			X
Other			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.

The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**



**CARDIFF COUNCIL**

**Equality Impact Assessment  
Corporate Assessment Template**

The senior staff in a school would be best placed to manage diversity in terms of belief. (e.g. provision of a space for prayer).

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men		X	
Women		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.

The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

Maintained school provision admits pupils of both sexes and this would continue to be the case.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.9 Sexual Orientation**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		X	
Gay Men		X	
Gay Women/Lesbians		X	
Heterosexual/Straight		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools will continue to apply the Council's policies on equal opportunities.

CARDIFF COUNCIL

Equality Impact Assessment  
Corporate Assessment Template

The Council would manage admissions to The Court and the Specialist Resource Base provision at Moorland, in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

Evidence collated by the Stonewall lobby group alleges that Lesbian, Gay, Bisexual people are likely to be discriminated against in workplace recruitment.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.10 Socio-economic Duty**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

	Yes	No	N/A

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes is expected to have a positive impact on the Socio-economic Duty. The Council's has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The delivery of 21st Century Learning environments will ensure that there are appropriate, high quality school places for young people, which needs to needs of Cardiff's growing and changing population.

The Council works closely with the governing bodies of schools to ensure that standards in schools are high, that teaching is good and that leadership and governance is strong.

The Council does not expect the proposal to have any negative impact on the quality of standards of education for pupils, at these schools.

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils. There is no information available that suggests that the proposals would have a negative effect on pupils who receive Free School Meals.

CARDIFF COUNCIL

Equality Impact Assessment  
Corporate Assessment Template

What action(s) can you take to address the differential impact?

N/A

3.11 Welsh Language

Will this Policy/ Strategy/Project/Procedure/Service/Function have a **differential impact (positive/negative)** on the Welsh Language?

	Yes	No	N/A

Please give details/ consequences of the differential impact, and provide supporting evidence, if any.

The level of special educational needs/ additional learning needs in the Welsh medium sector has historically been lower than in the English medium sector. This has been changing over the last 4-5 years, with schools reporting an increased incidence of ALN, in all areas of need.

A review of ALN in the Welsh medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with ALN leaving the Welsh medium sector in order to access specialist resource bases or special schools.

There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh medium education, opt instead for English medium if their child has ALN, in case their child needs to transfer to the specialist sector at a later date.

Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to generate more confidence in the availability of specialist provision in the sector.

A new primary base was established at Ysgol Pwll Coch within the catchment area of Ysgol Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.

In 2021 there is growing demand for resource bases for pupils with autism, who are average to high achievers, and would need a more integrative model of

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 9
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## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

support than that provided by the two existing bases. There are currently 8 secondary aged learners, and 15 primary aged learners who would benefit from placement in an ASD base. This is a short term priority, given the risk that if current placements fail, the only option would be to offer a transfer to an English medium setting.

A primary wellbeing class has been established, hosted at Ysgol Pen y Groes. The wellbeing class works flexibly to address needs in different age phases, or to provide an outreach model, depending on current need.

To support emotional health and wellbeing needs in secondary phase, a 'virtual' base/ PRU has been piloted across the three secondary schools, starting in 2018. The pilot is due for further review in 2021.

The priority is to ensure the three schools have adequate facilities and accommodation to provide effective Step 3 and 4 proviso, complemented by the virtual base/ PRU. Medium term, the virtual base/ PRU will eventually need a fixed location at one of the schools, with designated accommodation, to reduce the risk that young people with the most complex needs may need to leave the Welsh sector to access more specialist provision.

As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh medium education is a genuine choice for learners with complex ALN.

The pool of ALN qualified and experienced teaching staff is limited in comparison to the English sector. Any plan to develop Welsh medium specialist provision will need to be supported by an ALN Workforce Development Plan.

In accordance with the timetable set by Welsh Government, the Council is working closely with its partners on the Cardiff Welsh Education Forum to develop the new ten year WESP for the city. It is expected the plan will be available for public consultation in autumn 2021 before being submitted for approval to the Welsh Government in early 2022. The first ten year Plan will commence on 1 September 2022 and expire on 31 August 2032.

Consultation on the draft WESP will seek views on how best to grow Welsh-medium education and on how to meet the local targets set by Welsh Government, in order to inform future proposals. The WESP will set out how the Council will increase the provision of Welsh-medium education for pupils with additional learning needs.

#### **What action(s) can you take to address the differential impact?**

Demand for WM ALN places will be kept under review and proposals brought forward in line with the Welsh in Education Strategic Plan

## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

#### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

The Council's Accessibility Officer would be given the opportunity to comment on the schemes.

#### 5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	See Generic Over Arching below
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Socio-economic Duty	
Welsh Language	
Generic Over-Arching [applicable to all the above groups]	

#### 6. Further Action

## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Hibah Iqbal	Date: June 2021
Designation: School Organisation Project Officer	
Approved By:	
Designation:	
Service Area: Education	

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 2536 / 3262 or email [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)

## CARDIFF COUNCIL

### SCHOOLS STANDARDS AND ORGANISATION (WALES) ACT 2013

#### ADDITIONAL LEARNING NEEDS PROVISION

#### MOORLAND PRIMARY SCHOOL

**NOTICE IS HEREBY GIVEN** in accordance with Section 42 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, that Cardiff Council (herein after “the Authority”), having consulted such persons as appeared to them to be appropriate, propose to alter Moorland Primary School, 48 Singleton Road, Cardiff, CF24 2ET by:

- establishing a 20 place Specialist Resource Base at Moorland Primary School for primary aged children with Complex Learning Needs from September 2023

The school is currently maintained by Cardiff Council.

The Authority undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees and the Authority’s responses and the views of Estyn is available to view at:

[Agenda for Cabinet on Thursday, 10th March, 2022, 2.00 pm : City of Cardiff Council \(modern.gov.co.uk\)](http://modern.gov.co.uk)

The current school capacity is 420 places for children aged 4-11. There are 64 nursery places. The current number of pupils at the school is 386 (4 – 11) and 49 (nursery aged).

There are no plans to change the Council’s policy on the admission of children to schools as a result of this proposal.

Admissions to the specialist resource base would be managed by the local authority and be subject to a statement of Special Educational Needs (SEN) or Individual Development Plan (IDP) as appropriate.

Admissions to the specialist resource base would be separate to admissions to the main school and would be in addition to the school Published Admission Number (PAN).

Any arrangements for the transport of pupils will be made in accordance with the Authority’s existing policies on school transport.

Within a period of 28 days after the date of publication of these proposals, that is to say by 02 June 2022 any person may object to these proposals.

Objections should be sent to the Director of Education and Lifelong Learning, Cardiff Council, County Hall, Atlantic Wharf, Cardiff CF10 4UW.

Objections may also be sent to the Director of Education and Lifelong Learning, Cardiff Council using the following e-mail address: [SchoolResponses@cardiff.gov.uk](mailto:SchoolResponses@cardiff.gov.uk)

Please note that any such objection sent by e-mail must contain the full name and postal address of the objector.

The Authority will publish a summary of any such objections made (and not withdrawn in writing) within the objection period, together with their observations thereon, before the end of 7 days beginning with the day the proposal is determined.

Dated this 06 day of May 2022

Signed: Davina Fiore  
Director of Legal, Governance and Monitoring Officer  
For Cardiff Council

### EXPLANATORY NOTE

(This does not form part of the Notice but is intended to explain its general meanings)

Moorland Primary is an English-medium primary school located in Tremorfa.

To meet the demand for specialist provision for learners with additional learning needs it is proposed to establish a 20 place Specialist Resource Base for learners with complex learning needs at Moorland Primary School from September 2023.

The Council is progressing works to replace Early Years accommodation at Moorland Primary School and to locate Flying Start provision on the site.

The new building would accommodate the existing number of nursery class and Reception places.

Accommodation for the Specialist Resource Base would be provided as part of this planned work.

This proposal is part of a range of proposals for increasing the number of places available for pupils with complex learning needs and autism spectrum condition at a number of schools within the local authority. Details of these proposals and copies of the statutory notices can be seen at [Complex Learning Needs/Autism Spectrum Condition provision \(cardiff.gov.uk\)](http://Complex Learning Needs/Autism Spectrum Condition provision (cardiff.gov.uk))



By virtue of paragraph(s) 14, 21 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

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To: The Cabinet

From : Moorland Primary School Governing Body

28/10/2022

At our Governors' meeting we were updated on the ongoing delays to the planned building works for our school and understand that the decision to progress now rests with you.

Whilst these delays are both frustrating and disappointing and makes the management of our school extremely difficult, our overwhelming concern is about the ongoing degeneration of some of our current building which has not been adequately repaired or replaced pending the long-awaited building project. Of most concern to us is the Early Years building. Both the external and internal fabric have been unacceptable for some considerable time and as the governing body we unanimously agree that, in our opinion, the current building is no longer fit for purpose and is posing a risk to the health and wellbeing of our youngest children and our staff.

The Governors originally wrote to the council in 2016/17 providing an outline of issues and photographic evidence about the state of the early years building. At that time the children were sitting on floors covered in rugs and carpets covering damp mould, mould up the walls, water coming through the ceilings, and teachers being interrupted constantly on rainy days to bail water out of the classroom and gutters literally overflowing inside due to the sub-standard conditions of the building.

5 years later the situation has still not improved and reception children are still being subjected to the same conditions and our teachers are still having to cope with unacceptable working conditions. This cannot continue any longer. Moorland Primary serves its community above and beyond the realms of many other counterparts in Cardiff, serving an area with families struggling to survive in a time of austerity and cost of living crisis. These families do not have the time or the capacity to launch a campaign and battle with their local council to provide a basic standard of working and learning environment for their children and the teachers who work tirelessly to serve their needs. That is why, we as Governors are now saying enough is enough.

This building is still permanently damp, there is still black mould evident on both walls and flooring. When there is rain, the drains, which run inside the building, overflow and cause water to pool on flooring surfaces which are used for children's seating. The toilets are very poorly maintained, with several not functioning at all. The building permanently smells damp. The ceiling regularly falls in.

As a governing body we are responsible for ensuring that our children have a safe and healthy environment in which to learn and thrive and we no longer feel that we can discharge that responsibility for our Early Years' children. We are deeply concerned about the risk of respiratory and other illness which our children are developing and are now considering getting independent advice about the potential long term health impacts of this environment on children and the school's employees.

We have had numerous visits from council and contractor employees and there appears to be agreement with our opinion. What we now need is urgent action to address these concerns with practical and timely solutions.

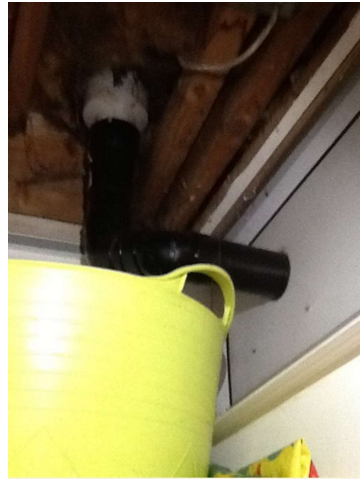
We need the following to happen without any further delay:-

- That there is a single point of contact who has delegated authority to make decisions about the required work and has accountability for keeping the school informed of decisions, actions and timescales.
- That the money is made available and contractors are engaged with immediate effect.
- Any issues that require urgent resolution to provide a safe and healthy environment are not subject to delay or cause significant cost implications for the school.
- That a report is commissioned about the current safety of the structure due to extensive water damage and that work is prioritised to keep our children safe.

We want to move forward swiftly and constructively in collaboration with the Council to finally give our children the environment which they deserve.

**Issues so far this term for EY Building at Moorland Primary School (15/10/22)**

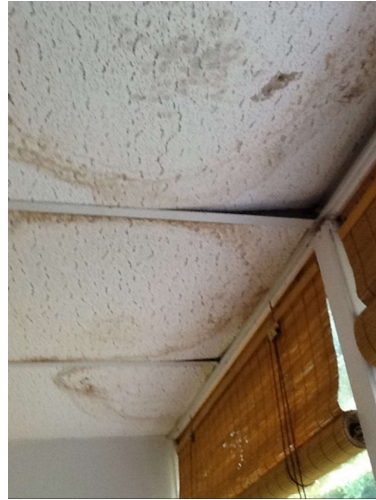
The leaking roof has supposedly been repaired and sealed but continues to leak. Picture shows area below repair. Further call logged



Ceiling tiles are replaced regularly but are continuing to bow as filled with water. This will eventually come down. Around the (internal) pipe water is dripping down and soaking the carpet. The whole area smells of damp



In the other end of the building the ceiling tiles have not long been replaced and are already bowing with water.



This week a bit of ceiling tile fell down on a child during a teaching session



During recent H&S inspection, Clive Kitchen, has highlighted the entrance to the building as unsafe. Children enter the nursery through the car park. He has said a pedestrian gate should be created to the right of the car park entrance. Without knowing timescales for building replacement it is hard to action this. A risk assessment is now in place.

The H&S inspection also highlighted the very poor quality of the soft play surface in the EY garden. This is coming up and a trip hazard. This has not been replaced as we had believed the building would have been demolished by now.

All wooden playground equipment has now rotted in EY play area and is in the process of being removed to keep it safe. It is not possible to replace this as we do not know the time scales for replacing the building

## Moorland Early Years Building November 8<sup>th</sup> 2022



Classroom area now taken out of use. These are new ceiling tiles under the most recent roof repair. Due to significant risk of further falling of tiles restricted access for children



Area beneath where some ceiling tiles have already fallen in the classroom



Ceiling in the second classroom area. We can now see directly through to the outside in parts of the classroom. Again, this is recent damage that has happened since the recent re-roofing



By virtue of paragraph(s) 14, 21 of Part(s) 4 and 5 of Schedule 12A of the Local Government Act 1972.

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## Appendix 6

### Cardiff Council Statutory Screening Tool Guidance

If you are developing a strategy, policy or activity that is likely to impact people, communities or land use in any way then there are a number of statutory requirements that apply. Failure to comply with these requirements, or demonstrate due regard, can expose the Council to legal challenge or other forms of reproach.

For instance, this will apply to strategies (i.e. Housing Strategy or Disabled Play Strategy), policies (i.e. Procurement Policy) or activity (i.e. developing new play area).

Completing the Statutory Screening Tool will ensure that all Cardiff Council strategies, policies and activities comply with relevant statutory obligations and responsibilities. Where a more detailed consideration of an issue is required, the Screening Tool will identify if there is a need for a full impact assessment, as relevant.

The main statutory requirements that strategies, policies or activities must reflect include:

- **Equality Act 2010 - Equality Impact Assessment**
- **Welsh Government's Sustainable Development Bill**
- **Welsh Government's Statutory Guidance - Shared Purpose Shared Delivery**
- **United Nations Convention on the Rights of the Child**
- **United Nations Principles for Older Persons**
- **Welsh Language Measure 2011**
- **Health Impact Assessment**
- **Habitats Regulations Assessment**
- **Strategic Environmental Assessment**

This Statutory Screening Tool allows us to meet all the requirements of all these pieces of legislation as part of an integrated screening method that usually taken no longer than an hour.

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The Screening Tool can be completed as a self assessment or as part of a facilitated session, should further support be needed. For further information or if you require a facilitated session please contact the Policy, Partnerships and Citizen Focus Team on 2078 8563 e-mail: [siadavies@cardiff.gov.uk](mailto:siadavies@cardiff.gov.uk). Please note:

- **The completed Screening Tool must be submitted as an appendix with the Cabinet report.**
- **The completed screening tool will be published on the intranet.**

## Statutory Screening Tool

<b>Name of Strategy / Policy / Activity:</b>  <b>SCHOOL ORGANISATION PROGRAMME: 21<sup>ST</sup> CENTURY SCHOOLS</b> REPLACEMENT OF THE EARLY YEARS UNIT AT MOORLAND PRIMARY SCHOOL AND RELOCATION OF FLYING START PROVISION FROM WILLOWS HIGH SCHOOL SITE AND ESTABLISHMENT OF 20 PLACE SRB	<b>Date of Screening:</b>  November 2022
<b>Service Area/Section:</b> Education & Lifelong Learning - Schools Organisation Programme EQIA to accompany Planning Application	<b>Lead Officer: Richard Portas</b>

<b>What are the objectives of the Policy/Strategy/Project/Procedure/Service/Function</b>	<b>Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]</b>
<p>The aims of this project are to:</p> <ul style="list-style-type: none"> <li>• Provide 21<sup>st</sup> century accommodation for Moorland Nursery 32FTE</li> <li>• Flying start provision for 44FTE with office space; this is an increase from 36FTE</li> <li>• Provide 8FTE child care offer places.</li> <li>• Provide an open plan environment suitable for early years to operate in;</li> <li>• Remove a C condition temporary unit from the Council's maintenance backlog responsibilities;</li> <li>• Develop a 20 place SRB for pupils with Complex Learning Needs – spilt 10FP and 10 KS2;</li> <li>• Develop a community room for up to 12 parents with supporting crèche space;</li> <li>• Creche should be of a size to have 8 children to include toilet</li> </ul>	<ul style="list-style-type: none"> <li>• Moorland Early Years Unit is currently located in a demountable unit at the rear of Moorland Primary site, Splott.</li> <li>• The unit has been rated as a condition C building.</li> <li>• It currently accommodates 32 Nursery children am &amp; pm as well as 60 Reception children.</li> <li>• This project was initially in response to the poor condition of the Early Years unit at Moorland Primary School.</li> <li>• Within Band A Moorland Primary was planned to be extend to 3FE with a refurb of their Early Years Unit (Nursery &amp; Reception classes) however pupil numbers did not materialise and this proposal was withdrawn, along with any associated funding.</li> </ul>

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access for the children and this space would need to hold a changing area.

- The scope has developed to include selling of Education land for residential development as well as developing an early years and SRB extension for pupils with complex learning needs.
- Towards the end of 2020, plans came forward to incorporate a Flying Start facility (to be moved from Willows High School site) into the project, causing a design and scope change.

**Formal Statutory Consultation to follow if planning application granted:**

- Due to the addition of an SRB and the change of use of an education site, there is a requirement to undertake a formal statutory consultation process.
- This could take between 9-12 months to complete.
- Agreement by Cardiff Council Schools Programme board that planning and procurement process can take place concurrently to the consultation.

## Part 1: Impact on outcomes and due regard to Sustainable Development

Please use the following scale when considering what contribution the activity makes:		
<b>+</b>	Positive	Positive contribution to the outcome
<b>-</b>	Negative	Negative contribution to the outcome
<b>ntrl</b>	Neutral	Neutral contribution to the outcome
<b>Uncertain</b>	Not Sure	Uncertain if any contribution is made to the outcome

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
Page 842	<b>1.1 People in Cardiff are healthy;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>the promotion of good health, prevention of damaging behaviour, promote healthy eating/active lifestyles etc,</li> <li>vulnerable citizens and areas of multiple deprivation</li> <li>Addressing instances of inequality in health</li> </ul>	x				- See 1.2 below – encouraging walking, cycling and use of public transport
	<b>1.2 People in Cardiff have a clean, attractive and sustainable environment;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>the causes and consequences of Climate Change and creating a carbon lite city</li> </ul>	x				N/A
	<ul style="list-style-type: none"> <li>encouraging walking, cycling, and use of public transport and improving access to countryside and open space</li> </ul>	x				<ul style="list-style-type: none"> <li>In line with the Well-being of Future Generations Act Cardiff's Band B programme is committed to providing Local Schools for Local Children, to encourage use of sustainable modes to travel to schools, such as walking and cycling. School projects take into account transport issues when they are being designed and the need to provide safer routes to encourage walking to schools</li> <li>Promotion of initiatives such as Kerbcraft training, training in cycling skills and the Local Authority's implementation of Active Travel measures</li> </ul>
	<ul style="list-style-type: none"> <li>reducing environmental pollution (land, air, noise and water)</li> </ul>	x				- Implementation of an effective travel plan would minimise the need for non-sustainable transport to and from schools
	<ul style="list-style-type: none"> <li>reducing consumption and encouraging waste reduction,</li> </ul>	x				- Proposals are progressed in line with Welsh Government

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
	<i>reuse, recycling and recovery</i>					Community Benefit Measurement Tool which encourages reduced consumption, waste reduction and recycling.
	<ul style="list-style-type: none"> <li><i>encouraging biodiversity</i></li> </ul>			x		- Site surveys will be undertaken to establish levels of biodiversity and will explore opportunities to develop appropriate initiatives.
<b>1.3</b>	<b>People in Cardiff are safe and feel safe;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>reducing crime, fear of crime and increasing safety of individuals</i></li> <li><i>addressing anti-social behaviour</i></li> <li><i>protecting vulnerable adults and children in Cardiff from harm or abuse</i></li> </ul>	x				- All schools in Cardiff have policies in place to ensure safeguarding and the wellbeing of staff, children and young people.
<b>1.4</b>	<b>Cardiff has a thriving and prosperous economy;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>economic competitiveness (enterprise activity, social enterprises, average earnings, improve productivity)</i></li> <li><i>Assisting those Not in Education, Employment or Training</i></li> <li><i>attracting and retaining workers (new employment and training opportunities, increase the value of employment,)</i></li> <li><i>promoting local procurement opportunities or enhancing the capacity of local companies to compete</i></li> </ul>	x				- The school provides employment.
<b>1.5</b>	<b>People in Cardiff achieve their full potential;</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li><i>promoting and improving access to life-long learning in Cardiff</i></li> <li><i>raising levels of skills and qualifications</i></li> <li><i>giving children the best start</i></li> <li><i>improving the understanding of sustainability</i></li> <li><i>addressing child poverty (financial poverty, access poverty, participation poverty)</i></li> <li><i>the United Nations Convention on the Rights of a Child and Principles for Older persons</i></li> </ul>	x				<ul style="list-style-type: none"> <li>- The Council's proposals for Band B of the 21<sup>st</sup> Century Schools Programme, and the Cardiff 2020 strategy, clearly state the link between improving the environment for learning and raising standards of achievement.</li> <li>- With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis. The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.</li> <li>- Cardiff's Child Friendly City strategy places the rights and</li> </ul>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
						<p>voices of children and young people at the heart of Cardiff's policies, strategies and services; involving them in decision making and addressing the barriers which limit their life chances. As such the public consultation on the proposal will include representation from children and young people.</p> <ul style="list-style-type: none"> <li>- Subject to approval any future design work would also include representation from children and young people.</li> </ul>
Page 84/17	<b>1.6 Cardiff is a Great Place to Live, Work and Play</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>• <i>promoting the cultural diversity of Cardiff</i></li> <li>• <i>encouraging participation and access for all to physical activity, leisure &amp; culture</i></li> <li>• <i>play opportunities for Children and Young People</i></li> <li>• <i>protecting and enhancing the landscape and historic heritage of Cardiff</i></li> <li>• <i>promoting the City's international links</i></li> </ul>	x		x		<ul style="list-style-type: none"> <li>- With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis. The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.</li> </ul>
	<b>Cardiff is a fair, just and inclusive society.</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>• <i>the elimination of discrimination, harassment or victimisation for equality groups</i></li> </ul>	x		x		<ul style="list-style-type: none"> <li>- See Equality Impact Assessment below and attached.</li> <li>- The Council's recruitment process ensure that good practice is followed, including the application of the Council's policies on equal opportunities.</li> </ul>
	<ul style="list-style-type: none"> <li>• <i>has the community or stakeholders been engaged in developing the strategy/policy/activity?</i></li> <li>• <i>how will citizen participation be encouraged (encouraging actions that consider different forms of consultation, through more in depth engagement to full participation in service development and delivery)?</i></li> </ul>	X				<ul style="list-style-type: none"> <li>- The public engagement will include engagement with all relevant stakeholders.</li> <li>-</li> </ul>
	<b>EQUALITY IMPACT ASSESSMENT (This is attached on page 13)</b> <i>Will this Policy/Strategy/Project have a differential impact on any of the following:</i>					



	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
1.8	<p><b>The Council delivers positive outcomes for the city and its citizens through strong partnerships</b></p> <p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>strengthening partnerships with business and voluntary sectors</i></li> <li><i>the collaboration agenda and the potential for shared services, cross-boundary working and efficiency savings</i></li> </ul>	x				<p>The 'Cardiff Commitment' is the Council's youth engagement and progression strategy. The Cardiff Commitment sets out how the council, together with a wide range of public, private and third sector partners, will work together to ensure a positive destination for every young person in Cardiff after they finish school, either in employment or further education and training.</p> <p>To date over 120 businesses have pledged to support Cardiff Commitment and provide opportunities to schools and young people, better preparing them for the world of work, contributing to the future economic growth of the city.</p> <p>The Council's proposals for Band B of the 21<sup>st</sup> Century Schools Programme, and the Cardiff 2020 strategy, clearly state the link between improving the environment for learning and raising standards of achievement.</p> <p>The Council is keen to assist with the development of opportunities between schools and businesses, to help create a sustainable pool of talent for future workforce needs, and spread skills across the city. An example of this is the Creative Education Partnership that has been established between Cardiff West Community High School and partners from the creative industries to provide opportunities for young people to leave education with skills and competences and to be work ready</p> <p>The significant school developments proposed would provide opportunities for strong partnerships with businesses and employers from a range of sectors in the Cardiff economy. Opportunities for further partnerships are being explored and will be progressed in line with the priorities set out in the Cardiff Commitment.</p> <p>The addition of a new community room and crèche would allow for courses or programmes such as parenting, dietetics, parent and baby groups to take place which would enrich and increase</p>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
						the offer of health and wellbeing within the area. The community room will be available for hire in the local community.

**SUMMARY OF APPRAISAL (highlight positive and negative effects of the policy / plan / project being assessed, demonstrating how it contributes to the economic, social and environmental sustainability of the city):**

**Economic**

Investment in new build facilities that would support the delivery of a broad and balanced curriculum. The new accommodation and expansion of provision would provide employment opportunities. Consideration would be given to using local contractors and suppliers.

**Social**

There could be the potential for community use of school facilities outside of school hours.

**Environmental sustainability**

This proposal would result in the pupils attending a new build, fit for purpose 21st Century schools. The proposal is subject to SAB approval to ensure sustainable drainage methods, mitigating the water run off impact from building on the site.

The buildings will be modular off site construction to minimise disruption on site

**WHAT ACTIONS HAVE BEEN IDENTIFIED OR CHANGES BEEN MADE TO THE POLICY / PLAN / PROJECT AS A RESULT OF THIS APPRAISAL:**

If the proposal were to proceed, an equality impact assessment would be carried out to identify accessibility to the new build school.

The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

## Part 2: Strategic Environmental Assessment Screening

		Yes	No
2.1	Does the plan or programme set the framework for future development consent?	x	
2.2	Is the plan or programme likely to have significant, positive or negative, environmental effects?		x

Is a Full Strategic Environmental Assessment Screening Needed?	Yes	No
<ul style="list-style-type: none"> <li>▪ If yes has been ticked to both questions 2.1 and 2.2 then the answer is yes</li> <li>▪ If a full SEA Screening is required then please contact the Sustainable Development Unit to arrange (details below)</li> </ul>		X An SEA has been undertaken (attached)

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If you have any doubt on your answers to the above questions regarding SEA then please consult with the Sustainable Development Unit on 2087 3228 or [sustainabledevelopment@cardiff.gov.uk](mailto:sustainabledevelopment@cardiff.gov.uk)

## Part 3: Habitat Regulation Assessment (HRA)

		Yes	No	Unsure
3.1	Will the plan, project or programme result in an activity which is known to affect a European site, such as the Severn Estuary or the Cardiff Beech Woods?		x	
3.2	Will the plan, project or programme which steers development towards an area that includes a European site, such as the Severn Estuary or the Cardiff Beech Woods or may indirectly affect a European site?		x	
3.3	Is a full HRA needed?		x	

Details of the strategy will be sent to the County Ecologist on completion of the process to determine if a Habitat Regulation Assessment is needed. For further information please phone 2087 3215 or email [biodiversity@cardiff.gov.uk](mailto:biodiversity@cardiff.gov.uk)

## Appendix 1 – Statutory Requirements

It is possible that the Impact Screening Tool will identify the need to undertake specific statutory assessments:

- **Equality Impact Assessment:** *This assessment is required by the Equality Act 2010 and Welsh Government’s Equality Regulations 2011.*
- **Sustainable Development Bill:** *The Bill, when it comes into effect, will require sustainable development (SD) to be a central organising principle for the organisation. This means that there is a duty to consider SD in the strategic decision making processes.*
- **Shared Purpose Shared Delivery-** *The Welsh Government requires local authorities to produce a single integrated plan to meet statutory requirements under a range of legislation. Cardiff Council must therefore demonstrate its contribution towards Cardiff’s own integrated plan; “What Matters”.*
- **United Nations Convention on the Rights of the Child:** *The Children Act 2004 guidance for Wales requires local authorities and their partners to have regard to the United Nations Convention on the Rights of a Child.*
- **United Nations Principles for Older Persons:** *The principles require a consideration of independence, participation, care, self-fulfillment and dignity.*
- **The Welsh Language Measure 2011:** *The measure sets out official status for the Welsh language, a Welsh language Commissioner, and the freedom to speak Welsh.*
- **Health Impact Assessment:** *(HIA) considers policies, programmes or projects for their potential effects on the health of a population*
- **Strategic Environmental Impact Assessment:** *A Strategic Environmental Assessment (SEA) is an European Directive for plans, programmes and policies with land use implications and significant environmental effects.*
- **Habitats Regulations Assessment:** *The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 provides a requirement to undertake Habitats Regulations Assessment (HRA) of land use plans.*

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Please consult with the Equality Team for any assistance with completing this assessment- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)

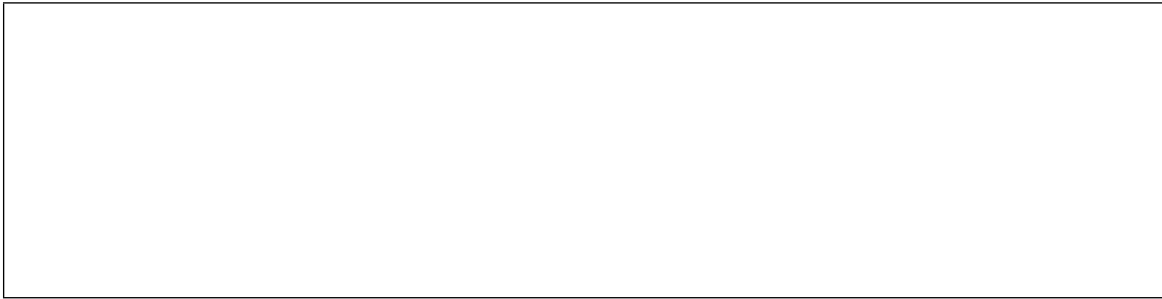
Policy/Strategy/Project/Procedure/Service/Function Title: **SCHOOL ORGANISATION PROGRAMME: 21<sup>ST</sup> CENTURY SCHOOLS REPLACEMENT OF THE EARLY YEARS UNIT AT MOORLAND PRIMARY**

SCHOOL AND RELOCATION OF FLYING START PROVISION FROM WILLOWS HIGH SCHOOL SITE
<b>New/Existing/Updating/Amending: Updating</b>

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Richard Portas	Job Title: Director of 21 <sup>st</sup> Century Schools
Service Team: Education & Lifelong Learning - Schools Organisation Programme	Service Area:
Assessment Date: March 2021	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

Page 8 of 9	<p>The aims of this project are to:</p> <ul style="list-style-type: none"> <li>• Provide 21<sup>st</sup> century accommodation for Moorland Nursery 32FTE</li> <li>• Flying start provision for 44FTE with office space; this is an increase from 36FTE</li> <li>• Provide 8FTE child care offer places.</li> <li>• Provide an open plan environment suitable for early years to operate in;</li> <li>• Remove a C condition temporary unit from the Council's maintenance backlog responsibilities;</li> <li>• Develop a 20 place SRB for pupils with Complex Learning Needs – split 10FP and 10 KS2;</li> <li>• Develop a community room for up to 12 parents with supporting crèche space;</li> <li>• Crèche should be of a size to have 8 children to include toilet access for the children and this space would need to hold a changing area.</li> </ul>
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1. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]

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Moorland Early Years Unit is currently located in a demountable unit at the rear of Moorland Primary site, Splott.

The unit has been rated as a condition C building.

It currently accommodates 32 Nursery children am & pm as well as 60 Reception children.

- This project was initially in response to the poor condition of the Early Years unit at Moorland Primary School.
- Within Band A Moorland Primary was planned to be extended to 3FE with a refurb of their Early Years Unit (Nursery & Reception classes) however pupil numbers did not materialise and this proposal was withdrawn, along with any associated funding.
- The scope has developed to include selling of Education land for residential development as well as developing an early years and SRB

extension for pupils with complex learning needs.

- Towards the end of 2020, plans came forward to incorporate a Flying Start facility (to be moved from Willows High School site) into the project, causing a design and scope change.

Formal Statutory Consultation to follow if planning application granted:

- Due to the addition of an SRB and the change of use of an education site, there is a requirement to undertake a formal statutory consultation process.
- This could take between 9-12 months to complete.
- Agreement by Cardiff Council Schools Programme board that planning and procurement process can take place concurrently to the consultation.

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### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	x		
18 - 65 years		x	
Over 65 years		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The impact will be **positive** as the project will:

- Replace nursery provision at Moorland Nursery for 32FTE in new build accommodation fit for the 21<sup>st</sup> Century Early Years curriculum;
- Relocate Flying Start accommodation from existing site at Willows High School for 44FTE places with accompanying office space; This is an increase from 36FTE
- Provide 8 Child care offer places
- Provide an open plan environment suitable for early years to operate in;
- Remove a C condition temporary unit from the Council's maintenance backlog responsibilities;
- Develop a 20 place SRB for pupils with Complex Learning Needs – split 10FP and 10 KS2;
- Develop a community room for up to 12 parents with supporting crèche to accommodate up to 8 children with toilet access and a changing area.

What action(s) can you take to address the differential impact?

N/A

### 3.2 Disability

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment		x	
Physical Impairment		x	
Visual Impairment		x	
Learning Disability		x	
Long-Standing Illness or Health Condition			x
Mental Health			x
Substance Misuse			x
Other			x

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**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**Accessibility of the accommodation**

An equality impact assessments would be carried out to identify the accessibility of the new school building. The equality impact assessments would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

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**9.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

The proposal would need to ensure compliance with the Council's policies on equal opportunities.

An equality impact assessments would be carried out to identify the accessibility of the new school building. The equality impact assessments would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

**What action(s) can you take to address the differential impact?**

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**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			x
Civil Partnership			x

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

<b>What action(s) can you take to address the differential impact?</b>

### 3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			x
Maternity			x

<p><b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b></p> <p>The Council's procedure for managing staffing changes would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.</p> <p>An equality impact assessment would be carried out to identify the accessibility of the new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.</p>
--

<b>What action(s) can you take to address the differential impact?</b>

### 3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		x	
Mixed / Multiple Ethnic Groups		x	
Asian / Asian British		x	
Black / African / Caribbean / Black British		xx	
Other Ethnic Groups			

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<p>The proposal would not have a differential impact upon one particular ethnic group as the provision would be available to all.</p>
<b>What action(s) can you take to address the differential impact?</b>

n/a

### 3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		X	
Christian		X	
Hindu		X	
Humanist		X	
Jewish		X	
Muslim		X	
Sikh		X	
Other		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposal would not have a differential impact upon people with different religions, beliefs or non-beliefs as the provision would be available to all.

The senior staff in a school would be best placed to manage diversity in terms of belief. (e.g. provision of a space for prayer).

**What action(s) can you take to address the differential impact?**

n/a

### 3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men		x	
Women		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

Maintained school provision admits pupils of both sexes and this would continue to be the case.

The Council's procedure for managing any staffing changes would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

What action(s) can you take to address the differential impact?

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### 3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		X	
Gay Men		X	
Gay Women/Lesbians		X	
Heterosexual/Straight		x	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<p>(Fears that recruitment opportunities could be affected by sexual orientation)</p> <p>Evidence collated by the Stonewall lobby group alleges that Lesbian, Gay, Bisexual people are likely to be discriminated against in workplace recruitment.</p> <p>The Council's procedure for managing staffing changes would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.</p>
<b>What action(s) can you take to address the differential impact?</b>

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**3.10 Socioeconomic Duty**

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas)

	Yes	No	N/A
Socioeconomic impact			
<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>			
<b>What action(s) can you take to address the differential impact?</b>			

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**3.11 Welsh Language**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language		x	



**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

### **Language support**

- The proposal will not directly impact on the level of support provided. The allocation of teachers and BTAs is usually in place for the period of the academic year but is liable to change throughout the year to meet fluctuations in demand.

### **Impact of the proposal on the Welsh Language**

- It is not anticipated that there will be any differential impact on the Welsh Language, as a result of this proposal.
- The teaching of Welsh within an English medium setting is subject to the requirements of the National Curriculum. This would not change with the expansion of the school. This proposal does not seek to change the number of Welsh-medium primary or secondary school places available in the area.

The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.

- The council monitors birth rates, the yield from proposed housing and the patterns of take-up in Welsh-medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.

Whilst forecasts, based on the number of children in the Welsh-medium primary, indicate that additional capacity will be required to meet the demand for places in Welsh-medium secondary schools, separate proposals will be brought forward at the appropriate time to ensure there are sufficient places available

<b>What action(s) can you take to address the differential impact?</b>

**4. Consultation and Engagement**

What arrangements have been made to consult/engage with the various Equalities Groups?

Page 4 of 20	<p>The Council's Accessibility Officer would be given the opportunity to comment on the scheme.</p>
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**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	
Disability	
Gender Reassignment	
Marriage & Civil Partnership	

Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Welsh Language	
Generic Over-Arching [applicable to all the above groups]	If the proposal were to proceed, an equality impact assessment would be carried out to identify the accessibility of the new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

## 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

## 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By :Rachel Burgess Willis	Date: March 21
Designation:	
Approved By:	
Designation:	
Service Area:	

7.1 On completion of this Assessment, please ensure that the form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk).

For further information or assistance, please contact the Equality Team- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)



**AGREED SYLLABUS FOR RELIGION, VALUES AND ETHICS  
(CARDIFF) AND TERMS OF REFERENCE**

**EDUCATION (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM:7**

**Reason for this Report**

1. To present the existing Cardiff Agreed Syllabus for Religious Education to Cabinet for re-adoption for pupils of Religious Education, during the period of Religion, Values and Ethics curriculum rollout.
2. To present the new Cardiff Agreed Syllabus for Religion, Values and Ethics (RVE) to cabinet for adoption and have agreement that schools can start to deliver this agreed syllabus,
3. To agree the revised Terms of Reference for the Standing Advisory Council for Religious Education (SACRE)/Standing Advisory Council (SAC).
4. **Background**
5. The introduction of the Curriculum and Assessment (Wales) Act 2021 (the Act) established the Curriculum for Wales in law and replaced the previous curriculum (which includes, for example, the national and local curricula set out in Part 7 of the Education Act 2002).
6. The Curriculum and Assessment (Wales) Act 2021 Act sets out 'Religion, Values and Ethics' (RVE) as one of the mandatory subjects which spans the 3 to 16 learning continuum. The subject of RVE forms part of the Humanities Area of Learning and Experience within the new Curriculum for Wales. Subject specific guidance on RVE contained within the Humanities Area of the Curriculum for Wales, is statutory and is published under section 71 of the Act. The guidance is designed to assist those responsible under the Act for designing the RVE syllabus as part of the school curriculum.
7. The 2021 Act states that Local Authority Standing Advisory Councils for RVE (SACs) and agreed syllabus conferences (ASCs), are still responsible for creation of a locally agreed syllabus. Under the previous curriculum, the Local Authority's SACRE and ASC committees held these responsibilities.

8. Cardiff Council convened Agreed Syllabus Conferences in January, March, and June 2022. The current curriculum was first adopted in 2008. In June 2013 the Agreed Syllabus Conference endorsed the re-adoption of the Cardiff Agreed Syllabus, with an understanding that the syllabus would be reviewed once further information is received in relation to the National Curriculum review.
9. The current Cardiff agreed syllabus for Religious Education was considered suitable for recommendation to be readopted by the local authority.
10. This was in accordance with the legal requirement for a local authority to review and reconsider their agreed syllabus for Religious Education within five years of its adoption or re-adoption.
11. The Agreed Syllabus Conference are recommending that the Cardiff Agreed Syllabus for Religious Education is readopted for those learners who are not following the Religion, Values and Ethics curriculum, until the implementation of the Curriculum for Wales is completed.

## **Issues**

### The Curriculum for Wales

12. Cardiff ASC has worked with practitioners to develop this new agreed syllabus in line with the Curriculum for Wales legislation. One change is that this locally agreed syllabus must 'have regard' to the national RVE guidance. The Cardiff agreed syllabus development has focused on local elements specific to RVE, whilst also having regard to the national guidance.
13. The Cardiff locally agreed syllabus for RVE (and SAC/ASC membership) retains the requirement to 'reflect the fact that the religious traditions in Wales are in the main Christian while taking account of the teaching and practices of the other principal religions represented in Wales'.
14. The legislation now adds the explicit requirement to 'reflect the fact that a range of non-religious philosophical convictions are held in Wales'. Although already a requirement in England and Wales due to the European Convention on Human Rights, it is now written directly into education law and is reflected in the Cardiff locally agreed syllabus.
15. One of the four purposes of the new curriculum is to 'create ethical citizens of Wales and the World'. Being able to present a range of religious and non-religious beliefs will enable children to develop a deep understanding and acceptance of their own and other's communities.
16. The Act also requires RVE to be delivered in a 'critical, objective and pluralistic' manner. Whilst this is not a new requirement, it takes on greater significance as the new legislation removes the parental right to

withdraw from RVE. As of September 2022, there is no parental right to withdraw from RVE in respect of all learners up to and including year 6, as the Curriculum for Wales will be implemented by all primary schools and settings from this date.

17. The curriculum for Wales is being rolled out from September 2022 on a phased basis. Given the Curriculum for Wales phased instruction, there will be some year groups to which the current legislative requirements for Religious Education still apply. Therefore, Cardiff will also need to reconsider and readopt their current locally agreed syllabus for Religious Education that applies to these older pupils in Secondary settings. This is in line with the five-year review cycle that is required.

#### Support to Schools and requirements

18. Cardiff SACRE will continue to support schools with the requirements of the 'legacy' curriculum during the phased roll out of the new Curriculum for Wales. In addition, SAC for RVE will support schools with the requirements of the Curriculum for Wales 2021.
19. Welsh Government will publish specific RVE training material (developed in partnership with the Wales Association of SACRE's (WASACRE). This, together with support from Cardiff SAC and Central South Consortium, will provide opportunity to deliver an exceptionally rich and diverse curriculum, inspiring learners to engage with RVE from nursery onwards.
20. Cardiff Agreed Syllabus Conferences were convened, in 2022, to devise the new locally determined Agreed Syllabus for Religion, Values and Ethics (RVE) to fit the Curriculum for Wales Act 2021. The Curriculum for Wales legislation for RVE states: "A new syllabus replacing the current agreed syllabus must be adopted by a local authority for use in schools and settings implementing the Curriculum for Wales." Further information can be found in Appendix 2.
21. All schools and settings within the Cardiff area must have 'regard to' this locally Agreed Syllabus for RVE when designing and implementing their curriculum and RVE must be clearly evidenced through school's curriculum design and planning processes.

## The agreed Syllabus and roll out

22. The Cardiff Agreed Syllabus Conferences brought a working party of teachers, representatives from faith and non-religious groups, local authority officers and experts in the field of RVE to create the new locally RVE Agreed syllabus.
23. The Cardiff Religion, Values and Ethics Agreed Syllabus has been written to be accessible to all those responsible for designing and delivering the RVE curriculum. The intended audience includes:
- the headteacher of a maintained school or a maintained nursery school;
  - the governing body of a maintained school or a maintained nursery school;
  - a provider of funded non-maintained nursery education;
  - the teacher in charge of a pupil referral unit;
  - the management committee for a pupil referral unit;
  - a person who provides teaching and learning for a child, otherwise than at a maintained school, maintained nursery school or pupil referral unit, by virtue of arrangements made under section 19A of the Education Act 1996 (c. 56); and
  - the Cardiff local authority in Wales.
24. The implementation of the new Cardiff Agreed Syllabus will be effective from September 2022, for Religion, Values and Ethics in respect of all learners, up to and including year 6.
25. In respect of year 7 learners, schools in the region will have flexibility on whether to roll out the Curriculum for Wales in September 2022, or to roll out the Curriculum for Wales for years 7 and 8 together in September 2023.
26. During the period of curriculum roll out, as a secondary school or setting 'adopts' the Curriculum for Wales Framework for a particular year group, this Cardiff Agreed Syllabus will supersede the current/legacy Cardiff Agreed Syllabus.
27. From September 2023, this new Agreed Syllabus, in respect of years 7 and 8 as all schools and settings will have implemented the Curriculum for Wales for those learners. Thereafter, the phased roll-out of the Curriculum for Wales will continue, and this Cardiff Agreed Syllabus will supersede the other:
- year 9 learners in September 2024.
  - year 10 learners in September 2025.
  - year 11 learners in September 2026.



### Cardiff Terms of Reference (Revised Constitution of SACRE/SAC for RVE)

28. The Cardiff Terms of Reference (Revised Constitution of SACRE/SAC for RVE, October 2022) have been revised considering the current changes to the legislation within the Curriculum for Wales.
29. The legislation itself is clear that RVE includes non-religious philosophical views, including beliefs such as humanism, atheism and secularism, although not an exhaustive list. These changes make explicit what the law already requires in respect of pluralistic RVE.
30. Standing Advisory Councils on Religious Education (SACRE) will be renamed Standing Advisory Councils (SAC) for RVE for the Curriculum for Wales 2021. They will advise on matters relating to religion, values and ethics. 'SACRE' will be required to continue to advise on matters relating to Religious Education, until the Curriculum for Wales 2021 rolls out in its entirety to all learners. Both SACRE and SAC will run concurrently until the full roll out of the new curriculum occurs.

### **Local Member consultation**

31. Local members were involved within the ASC and the working group discussions in line with the legislation for RVE

### **Reason for Recommendations**

32. The current (soon to be legacy) Cardiff Agreed Syllabus for Religious Education needs to be readopted so schools can continue to deliver Religious Education in accordance with this agreed syllabus for those learners not in receipt of the Curriculum for Wales RVE curriculum, due to the phased roll out.
33. The Agreed Syllabus for Religion, Values and Ethics needs to be agreed by cabinet so that schools can move forward with delivery.
34. The Terms of Reference (Revised Constitution of SACRE/SAC for RVE, October 2022) be agreed.

### **Financial Implications**

35. There are no financial implications for this report

### **Legal Implications**

36. Section 375A Education Act 1996 requires each local authority to adopt an agreed syllabus for Religious Education for use in the schools maintained by them, until the Curriculum for Wales roll-out is completed for all learners. This report recommends the re-adoption of the current Cardiff agreed syllabus, for these learners, as set out in Appendix 1. Schedule 31 of the Education Act 1996 requires this syllabus to be reconsidered at least every five years.

37. Section 375A Education Act 1996 (as inserted by the Curriculum and Assessment (Wales) Act 2021 now requires each local authority to adopt a syllabus of Religion, Value and Ethics for use in the schools maintained by them. This report recommends the adoption of the syllabus as set out in Appendix 2.
38. Under section 375A the syllabus -
- (a) must reflect the fact that the religious traditions in Wales are in the main Christian while taking account of the teaching and practices of the other principal religions represented in Wales,
  - (b) must also reflect the fact that a range of non-religious philosophical convictions are held in Wales.
39. The recommended adoption of these syllabi seeks to comply with these statutory duties. All schools within the Local Authority must have regard to the Local Agreed Syllabus for RE or RVE adopted by the Council when designing their school curriculum.
40. Members will note the provisions introduced by the Curriculum and Assessment Act 2021 re-title SACRE to SAC and change the composition requirements. The revised Terms of Reference presented for adoption reflect the updated legislation requirements.

### **HR Implications**

41. There are no HR Implications for this report

### **Property Implications**

42. There are no Property implications for this report

### **RECOMMENDATIONS**

Cabinet is recommended to:

1. Agree and support the readoption of the current Cardiff Agreed Syllabus for Religious Education attached at Appendix 1
2. Agree and support the new Cardiff Agreed Syllabus for Religion, Values and Ethics attached at Appendix 2
3. Agree the revised Terms of Reference (Revised Constitution of SACRE/SAC for RVE, October 2022) attached at Appendix 3

<b>SENIOR RESPONSIBLE OFFICER</b>	Melanie Godfrey Director of Education & Lifelong Learning
	9 December 2022

*The following appendices are attached:*

Appendix 1 – Religious Education Agreed Syllabus 2008

Appendix 2 – Agreed Syllabus for Religion Values and Ethics

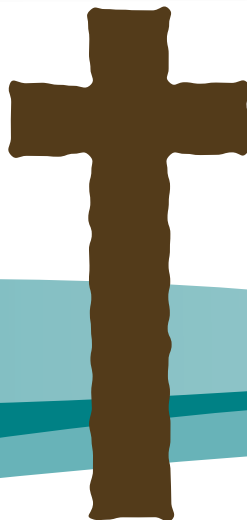
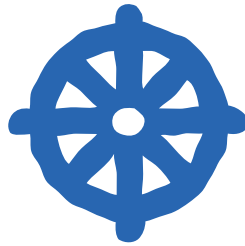
Appendix 3 – Revised Terms of Reference

Appendix 4 – Impact assessment

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# Schools and Lifelong Learning Service

## Religious Education Agreed Syllabus 2008



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## ACKNOWLEDGEMENTS

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### Photographs

Baden Powell Primary School, Llysfaen Primary School, Rhiwbina Primary School (front cover) and Fitzalan High School

# FOREWORD

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Religious education has always been an essential area of experience for learners in Cardiff, where the many faith communities represented in the city provide a rich context for the subject.

The study of religion in Cardiff schools will enhance children's and young people's awareness of the beliefs, teachings, practices, values and traditions of these faith communities, as well as raise challenging questions about the meaning and purpose of life. Religious education enables learners to reflect on their own beliefs and values whilst entering into dialogue with those who may hold different perceptions. This dialogue needs to take place in an atmosphere of respect and sensitivity and a willingness to learn from one another.

The new Cardiff Agreed Syllabus provides the framework to develop the skills, knowledge and understanding that the children and young people in our Cardiff schools require for an excellent religious education.



**Chris Jones**  
*(Chief Schools and Lifelong Learning Officer)*

# INTRODUCTION

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## The Agreed Syllabus in context

The Cardiff Council Agreed Syllabus (2008) is based on the National exemplar framework for religious education for 3 to 19-year-olds in Wales (2008) produced by the Department for Children, Education, Lifelong Learning and Skills of the Welsh Assembly Government.

The syllabus provides a coherent framework for the raising of standards among children and young people in Cardiff and complies with the legal obligations for a locally agreed syllabus which require:

- the promotion of the spiritual, moral, cultural, mental and physical development of pupils;
- appropriate provision for all registered pupils in every maintained school in Wales, including those in reception settings and those up to the age of 19;
- that Christianity should be studied at each key stage and that the other principal religions should be those represented in Great Britain;
- that religious education be non-denominational, but teaching about a particular catechism or formulary is not prohibited (i.e. similarities and differences in beliefs, teachings and practices of the religious traditions can be studied).

## The provision and planning of religious education

Religious education must be provided for all registered children in maintained schools, including those in reception classes and in sixth forms, but it is not a statutory requirement for children in nursery schools and nursery classes.

However, the Cardiff Agreed Syllabus provides guidance for the implementation of a non-statutory entitlement for children in nursery settings and the basis for planning statutory religious education for children in the rest of the Foundation Phase.

Special Schools should provide religious education for pupils based on the Agreed Syllabus as far as is practicable.

Schools are free to organise and deliver the curriculum in the way that best suits their circumstances and the needs of their learners (Making the Most of Learning - Department of Children, Education, Lifelong Learning and Skills, 2008), and this applies also to religious education. Religious education should play its part in the move towards more imaginative and innovative ways of curriculum organisation and schools should consider the exploration of, for example, thematic approaches with other subjects, collaboration in a skills focus or extended topic, etc.

There are no constraints relating to the time allocation or organisation of religious education, but schools should ensure that the provision is comparable to the non-core subjects and sufficient to deliver the programmes of study in the Agreed Syllabus.

## The religions specified

In order that learners might experience a broad and balanced study of the principal religions, the syllabus specifies religions at particular key stages. These are described below.

However, in addition to the specified religions, schools can choose to study aspects of other religions at their discretion.

Foundation Phase	Christianity and Judaism or Islam
Key Stage 2	Christianity, Judaism and Islam
Key Stage 3	Christianity, Sikhism and Hinduism
Key Stage 4	Christianity and at least one other principal religion of the school's choice
Post 16	Christianity and Buddhism



## The nature of religious education

Religious education in the twenty-first century encourages pupils to explore a range of philosophical, theological, ethical, and spiritual questions in a reflective, analytical, balanced way that stimulates questioning and debate.

It also focuses on understanding humanity's quest for meaning, the positive aspects of multi-faith/multicultural understanding, and pupils' own understanding of and responses to life and religion.

Religious education in the twenty-first century consists of an open, objective, exploratory approach but parents continue to have the legal right to withdraw their children.

## Including all learners

Religious education must play its part in developing children and young people's personalities and talents to the full, and in safeguarding and promoting their welfare.

It can help schools to develop in every learner a sense of personal and cultural identity that is receptive and respectful towards others, and promote approaches that support the ethnic and cultural identities of all learners as global citizens.

Schools must work to reduce environmental and social barriers to inclusion and offer opportunities for all learners to achieve their full potential in preparation for further learning and life. They need to respond to the challenge of removing barriers to learning, including disability, communication other than speech and a first language other than English or Welsh.

Religious education should be taught in ways appropriate to learners' developing maturities and abilities and enable them to use fully their preferred means of communication. Teachers should adopt a variety of learning and teaching styles and use material in ways suitable for the learners' age, experience, understanding and prior achievement in order to engage them in the learning process.

For learners working significantly below the expected levels at any key stage, schools should use the needs of the learner as a starting point and adapt the programmes of study accordingly. Where it is not possible to cover the content of all of the programmes of study for each key stage, the statutory requirement to provide a broad, balanced curriculum can be met by selecting appropriate topics/themes from the curriculum as contexts for learning.


For more-able and talented learners working at higher levels, schools should provide greater challenge by using material in ways that extend breadth and depth of study and the opportunities for independent learning.





## Skills across the curriculum


A non-statutory Skills framework for 3 to 19-year-olds in Wales (2008) has been developed in order to provide guidance about continuity and progression in developing thinking, communication, ICT and number for learners from 3–19.

At each phase and key stage learners in religious education should continue to acquire, develop, practise, apply and refine these skills through group and individual tasks.

 **Learners develop thinking skills** as they ask fundamental questions, explore and make links between the religious beliefs, teachings and practices that they study, and plan investigations by gathering and utilising a range of sources. They evaluate and justify their personal responses and use a range of critical and creative problem solving techniques to develop ideas and explore and challenge interpretations.

 In religious education, **learners develop communication skills** through asking questions, communicating ideas and expressing their own feelings and opinions. They listen carefully and critically to others and use different reading/writing strategies depending on the investigation or activity they are undertaking. They show increasing understanding of religious and symbolic language.


 **Learners develop use of ICT skills** when they communicate and share information (using, for example, e-mails and PowerPoint); present information in a variety of formats using word processing and graphics; find and develop information on the Internet and other sources including CD-ROMs, etc.; support oral presentations and the creation of ideas and strategies to improve the impact of their work.

 **Learners develop skills in the application of number** in religious education by using information such as ordering events in time, by measuring time through the calendars of various religions, by calculating percentages of tithing, and by considering the significance of number within religions. They interpret results/data and present findings from questionnaires, graphs and other forms of data in order to draw conclusions and ask further questions about issues relating to religion and the world.


## Learning across the curriculum

In religious education learners should be given opportunities to develop their knowledge and understanding of Wales, their personal and social development and well-being, and their awareness of the world of work.


At Key Stage 4 and Post-16, learners' knowledge and understanding should be developed and applied within the contexts of their individual 14–19 pathways including the Learning Core.

 **Religious education contributes to the Curriculum Cymreig** by allowing learners to appreciate the significance, value and impact of the rich Christian heritage and dynamic multi-faith composition of Wales, past and present.

Religious education contributes to Wales, Europe and the World by raising challenging questions from religious and non-religious perspectives: questions relating to political decision making, exploitation and justice, social freedom and responsibility, human rights issues, economic affluence and Wales' responsibility to, and relationship with, its own citizens and those in other parts of the world.

 **Religious education contributes to personal and social education** through exploration of the spiritual, moral, social and cultural dimensions. Learners develop understanding of and respect for various world religions and explore how religion affects the decisions and lifestyles within various cultures around the world.

Learners explore how many religions foster values and aspirations such as equality, justice, responsibility, peace and morality and will also be encouraged to question the values and aspirations of their own lives and the lives of others.

 **Religious education contributes to careers and the world of work** by providing insight into how religion influences believers in their choice of career and the standards expected of them in their working lives.

Knowledge of religious, cultural and ethical beliefs and practices can enhance community understanding and provide essential information for occupations such as medicine, politics, law and education.

Learners can evaluate various religious and moral perspectives relating to a range of business issues and offer a variety of transferable skills such as problem solving and critical thinking to the changing world of work.



# FOUNDATION PHASE PROGRAMME OF STUDY - SKILLS

## PEOPLE, BELIEFS AND QUESTIONS

Through an exploration of 'People, beliefs and questions' children will naturally develop skills and make links within all areas of learning in the Foundation Phase.

The programme provides non-statutory entitlement for children at nursery schools and classes, where the emphasis will be more on cultural and traditional stories and practical experiences relating to spiritual, moral and cultural endeavour. It will also be the basis on which to develop statutory provision for children in the rest of the Foundation Phase, where their natural inquisitiveness is further developed and they can learn more about themselves, other people and the world around them, in the context of the cultural and religious features of their community.

Through play and other planned activities children develop their ideas, opinions and feelings, ask questions and listen and respond to others.

They express their own feelings and opinions with a sensitivity to others from different cultural and religious backgrounds, and begin to understand the effect their actions have on others.

*In the Foundation Phase learners will develop their skills through exploration of Christianity predominantly and Judaism or Islam. Schools can choose to explore aspects of the other principal religions at their discretion.*

## A. KNOWLEDGE AND UNDERSTANDING OF THE WORLD

To experience the familiar world through investigating the indoor and outdoor environment, children should be encouraged to be curious and find out by:

- exploring and experimenting with new learning opportunities, including role play; visiting special / religious places; making and using artefacts; foods; ICT.
- thinking about and asking questions about themselves, other people and living things, and listening to the answers.
- responding to their own ideas and the ideas of others, including their hopes, dreams, opinions, rules and ways in which they approach happy and sad times.
- becoming aware of human achievements, including influential religious people past and present and the 'big ideas' that have shaped the world.
- investigating sources and issues raised through stories, holy books, festivals, celebrations and rites of passage.
- making comparisons and identifying similarities and differences of identity, lifestyle, community and tradition.
- thinking creatively and imaginatively about important human and religious questions.
- describing what they have found out about people, beliefs and questions and offering simple explanations.
- expressing their own opinions and feelings, and making decisions while considering the viewpoints of others.
- using and becoming familiar with common words and phrases for their world and the ways in which people express ideas, beliefs and meaning.



## B. PERSONAL AND SOCIAL DEVELOPMENT, WELL-BEING AND CULTURAL DIVERSITY.

### (A) Personal development

Children should be given opportunities to:

- express and communicate different feelings and emotions – their own and those of other people.
- show curiosity and develop positive attitudes to new experiences and learning, particularly when learning about people from other religions and cultures.
- become independent thinkers and learners by using well-considered ideas and strategies.
- value the learning, success and achievements of themselves and other people.

### (B) Social development

Children should be given opportunities to:

- be aware of and respect the needs of others.
- take responsibility for their own actions.
- consider the consequences of words and actions on themselves and others.
- develop an understanding of what is fair and unfair, while showing mutual respect.
- value friends and families and show care and consideration.
- develop a positive self-image and a sense of belonging as part of different communities, and to have an understanding of their own identity.
- develop an awareness of different cultures and the differing needs, views and beliefs of other people in their own and in other cultures.
- treat people from all cultural backgrounds in a manner that shows respect and understanding.
- develop an understanding of the diversity of roles that people play in different religious groups and communities.
- begin to question stereotyping.



## (C) Moral and spiritual development

### Children should be given opportunities to:

- respond to ideas and questions enthusiastically, sensitively, creatively, and intuitively.
- communicate about what is good and bad, right and wrong, fair and unfair, caring and inconsiderate.
- communicate and reflect on the decisions made in stories and situations, or personally, suggesting alternative responses, including those from religious perspectives.
- respond personally to simple imaginary moral situations, considering them from religious perspectives and giving reasons for decisions made.
- experience exciting, wonderful, inspirational, creative and/or quiet times and express ideas and feelings about these times creatively, explaining why they are significant.
- consider why people, including religious people, value and seek times of creativity, inspiration, awe and wonder, peace and tranquillity and revelation.
- talk about the choices available to individuals and discuss whether the choices available make a decision easier or more complex.
- ask questions about what is important in life from a personal perspective and from the perspective of other people.
- communicate ideas, values and beliefs about themselves, others and the world.

## (D) Well-being

### Children should be given opportunities to:

- value and contribute to their own well-being and to the well-being of others.
- be aware of their own feelings and opinions and develop the ability to express them in an appropriate balanced way.
- understand the relationship between feelings, beliefs and actions.
- understand that other people have feelings and beliefs that affect the way they think and behave.
- demonstrate care, respect and affection for other children, adults, other living things and their environment.
- develop a growing interest in the world around them and develop understanding and responsibility for living things and the environment.



# FOUNDATION PHASE

## RANGE - PEOPLE, BELIEFS AND QUESTIONS

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### THEMSELVES

- Their homes, families and experiences in order to explore their identity and belonging. *For example, personal experiences of festivals, celebrations, rites of passage.*
- Their personal responses. *For example, likes, dislikes, feelings including in times of joy and sadness; their hopes, dreams, opinions and sense of fun.*
- Their role and place in the community. *For example, as a member of their family; as part of a religious community; contributing to a charity.*
- The decisions that they make and resulting consequences. *For example, sharing, kindness, behaviour, choice, attitudes.*
- Deeper spiritual or moral meaning expressed in the stories, poems, artefacts, art, movement, rituals, celebrations and special times they experience. *For example, birthdays, St David's Day, traditional stories, stories about helping others, religious stories, dealing with happy and sad times, asking about big questions.*

### OTHER PEOPLE

- Other people's homes, families and experiences in order to explore similarities and differences of lifestyle and traditions. *For example, family celebrations and traditions, experience of religious festivals, worship, rules, food.*
- Special people and people who help them. *For example, children's families, teachers, members of the community, stories about Jesus and other influential religious leaders and people past and present.*
- Personal responses. *For example, likes, dislikes, including sharing feelings of hopes, dreams, opinions, ideas, experiences, opinions and a sense of fun with others.*
- People's roles and place in the community. *For example, as members of families, groups, religious groups, local religious leaders.*
- Decisions other people make and resulting consequences. *For example, rules, routines, choices, being part of a community.*
- Reasons why other people express a deeper spiritual/moral empathy towards other people. *For example, exploring why people help others in their work and free time – do their beliefs influence their lives?*
- The need to respect and challenge their own ideas/beliefs and those of other people. *For example, ask questions, share ideas and opinions.*

### LIVING THINGS

- The ways in which they and others show care, concern and respect for living things, the environment and the natural world. *For example, taking responsibility for animals and plants; asking questions and sharing opinions.*
- Responsibility and concern for the world. *For example, recycling; finding out how people can make a difference.*
- Awe and wonder. *For example, investigation of the natural world and the seasons.*

# OUTCOMES FOR RELIGIOUS EDUCATION

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The following outcomes for religious education are non-statutory. They have been written to recognise the attainment of pupils working below Level 1.

Religious Education Outcomes 1, 2 and 3 align with the Foundation Phase Outcomes 1, 2 and 3.

The religious education outcomes describe the types and range of performance that pupils working at a particular outcome should characteristically demonstrate. In deciding on a pupil's outcome of attainment at the end of a key stage, teachers should judge which description best fits the pupil's performance. Each description should be considered in conjunction with the description for adjacent outcomes.

Foundation Phase Outcome 1	Religious Education Outcome 1
Foundation Phase Outcome 2	Religious Education Outcome 2
Foundation Phase Outcome 3	Religious Education Outcome 3
Foundation Phase Outcome 4	Religious Education Level 1
Foundation Phase Outcome 5	Religious Education Level 2
Foundation Phase Outcome 6	Religious Education Level 3

## Outcome 1

Pupils recognise themselves, familiar people, places and objects in pictures/stories and show knowledge of daily routines. Pupils use words, signs or symbols to communicate observations about familiar religious stories and artefacts. With encouragement, pupils begin to communicate about how they feel and about experiences such as visits to special buildings, festivals and celebrations.

## Outcome 2

Pupils respond to open questions about their feelings and experiences ('what?', 'where?'). They offer their own ideas, sometimes making connections/predictions. Pupils handle and explore artefacts and show some knowledge of special people, books, and places of worship. They respond to stories and events, past and present. They begin to identify with the feelings of others as portrayed in religious stories and events past and present.

## Outcome 3

Pupils can remember significant events in the past and anticipate events in the future. Pupils offer independent ideas and observations about things that concern them in their lives. Pupils communicate their developing knowledge of religious stories, events and objects and show some appreciation that these are special. Pupils are increasingly aware of and are sensitive to the needs of others and understand that living things should be treated with respect and shown concern.

# KEY STAGE 2

## PROGRAMME OF STUDY - SKILLS

At Key Stage 2, religious education builds on the skills, knowledge and understanding acquired during the Foundation Phase.

It fosters learners' interest and wonder in the world and human experience, stimulating them into raising and investigating deep questions that relate to their personal experiences, religion and life in general.

Learners will be given opportunities to investigate the beliefs, teachings and practices of local faith communities, those throughout Wales and those of religious believers in a global context.

Their investigations will enable them to think about and discuss deeper religious and moral questions and respect the views of others.

Learners will consider their own feelings and express their own views and opinions while recognising that others might think differently.

*At Key Stage 2 learners will develop the three core skills in a study of Christianity, Judaism and Islam. Aspects of other religions can be addressed at the school's discretion.*

<b>ENGAGING WITH FUNDAMENTAL QUESTIONS</b>	<b>CORE SKILLS IN RE</b>	
	<b>EXPLORING RELIGIOUS BELIEFS, TEACHINGS AND PRACTICES</b>	<b>EXPRESSING PERSONAL RESPONSES</b>
<p>This involves raising and responding to fundamental questions. These are human and religious questions that focus on the search for meaning, significance and value in life.</p>	<p>This includes exploring religious stories, sacred texts, celebrations, lifestyle, rituals and symbolism, which provide the perceptions of faith communities to fundamental questions.</p>	<p>This is concerned with respectful consideration and evaluation of the experiences, values and beliefs of others and the questions these raise, and the ability to express one's own feelings and beliefs.</p>
<p><b>ENGAGE</b></p> <p><b>Pupils should be given opportunities to:</b></p> <ul style="list-style-type: none"> <li>ask, discuss and respond to fundamental questions raised by their own experiences, the world around them and aspects of religion;</li> <li>draw on a range of evidence from religious and non-religious sources in order to consider the issues raised;</li> <li>use evidence from a range of sources effectively in order to present and support arguments and opinions;</li> <li>develop alternative explanations and suggest new possibilities;</li> <li>carry out investigation in an open-minded way and be prepared to accept challenge in the light of new information or evidence.</li> </ul>	<p><b>EXPLORE</b></p> <p><b>Pupils should be given opportunities to:</b></p> <ul style="list-style-type: none"> <li>recall, describe and begin to explain religious beliefs, teachings and practices;</li> <li>explore and make links between religious beliefs, teachings and practices;</li> <li>describe and begin to explain the impact that religion has on the lives of believers;</li> <li>identify the similarities and differences within and across religions;</li> <li>recognise and begin to interpret meaning and symbolism within religious stories, rituals, art, dance and music.</li> </ul>	<p><b>EXPRESS</b></p> <p><b>Pupils should be given opportunities to:</b></p> <ul style="list-style-type: none"> <li>express and begin to justify their own feelings and opinions in a variety of ways;</li> <li>demonstrate how their learning has affected their own ideas and views;</li> <li>consider, appreciate, empathise with and respect the viewpoints of others;</li> <li>recognise, explore and reflect on the spiritual side of life;</li> <li>use a range of religious language appropriately;</li> <li>use ICT to gain access to information and to communicate ideas.</li> </ul>



# KEY STAGE 2

## PROGRAMME OF STUDY - RANGE

Pupils should be given opportunities to develop their skills within the following contexts for study, all of which should be explored during the key stage. These should not be studied discretely but interwoven to provide opportunities for pupils to engage, explore, and express.

### THE WORLD

#### *Life and its origins*

how different creation stories attempt to explain the origin of the world. *For example, stories about the creation of the world from Christianity, Judaism and Islam.*

#### *The natural world and living things*

how religions show concern and responsibility for the world. *For example, showing concern for the environment; developing a sense of awe and wonder in nature; having a responsible attitude towards animals.*

### HUMAN EXPERIENCE

#### *Human identity*

how individuals are both similar and different to others in their beliefs. *For example, in prayers; using religious objects; attendance at places of worship.*

#### *Meaning and purpose of life*

how and why religion is considered to provide insight into the deeper questions of life. *For example, why are we here? Is there a God? What happens when we die? Is there a heaven? How should I live my life?*

#### *Belonging*

how and why religious believers express their faith and share their beliefs and practices in order to create a sense of belonging and community. *For example, worship; festivals; religious dress; joining and commitment ceremonies.*

#### *Authority and influence*

how and why different forms of authority guide, influence and inspire people's lives. *For example, sacred texts; religious leaders past and present; important people within religious traditions; codes of behaviour.*

#### *Relationships and responsibility*

how religions show the importance of personal relationships and responsibility to others. *For example, marriage in faith communities; religious views on social issues; people who have shown extraordinary acts of religious commitment and sacrifice; religious care organisations.*

#### *The journey of life*

how and why religions mark and celebrate the stages of people's lives. *For example, ceremonies at birth, coming of age, marriage, death.*

### SEARCH FOR MEANING

#### *Exploring spirituality*

how people show their belief that life can be spiritual. *For example, belief in God; prayer; feelings and emotions; meaningful experiences.*

#### *Responding to spiritual experience*

how and why people act on their spiritual experience. *For example, showing love and forgiveness; helping in the community; giving up their lives for others; expressing themselves in art, music, poetry and worship.*

#### *Developing personal beliefs and values*

how and why people come to believe in the possibility of the spiritual. *For example, experiences of God; prayer; meditation; reflection; awe and wonder.*



# KEY STAGE 3

## PROGRAMME OF STUDY - SKILLS

At Key Stage 3 religious education builds on the skills, knowledge and understanding acquired at Key Stage 2. It stimulates learners to apply a range of skills to explore their understanding and experiences of life, the world, and search for meaning.

Learners will be given opportunities to investigate the beliefs, teachings and practices of local faith communities, those throughout Wales and those of religious believers in a global context.

They will explore a variety of religious perspectives on life and relate these to fundamental questions that affect all humanity, while continuing to ask deeper and more challenging questions. Their study will include the impact of religious belief and practice upon spiritual and moral issues of a personal and global nature.

Learners will consider and reflect on their own feelings and experiences and express and justify their own views and opinions.

*At Key Stage 3 learners will develop the three core skills in a study of Christianity, Sikhism and Hinduism. Aspects of the other principal religions can be addressed at the discretion of the school.*

### CORE SKILLS IN RE

#### ENGAGING WITH FUNDAMENTAL QUESTIONS

This involves raising and responding to fundamental questions. These are human and religious questions that focus on the search for meaning, significance and value in life.

#### EXPLORING RELIGIOUS BELIEFS, TEACHINGS AND PRACTICES

This includes exploring religious stories, sacred texts, celebrations, lifestyle, rituals and symbolism, which provide the perceptions of faith communities to fundamental questions.

#### EXPRESSING PERSONAL RESPONSES

This is concerned with respectful consideration and evaluation of the experiences, values and beliefs of others and the questions these raise, and the ability to express one's own feelings and beliefs.

### ENGAGE

Pupils should be given opportunities to:

- ask, discuss and respond to fundamental questions raised by their own experiences, the world around them and aspects of religion;
- draw on their own experiences and on a variety of religious and non-religious sources, in order to gather evidence and develop appropriate arguments;
- use higher order skills, formulate arguments and justify points of view, while recognising that the conclusions are only partial, inconclusive and open to different interpretations.

### EXPLORE

Pupils should be given opportunities to:

- recall, describe, and explain the religious beliefs, teachings and practices investigated;
- make and investigate the links between religious beliefs, teachings and practices to demonstrate understanding of a range of religious ideas and concepts;
- describe and give explanations for the similarities and differences within and across religions;
- explain how religion impacts on the lives of individuals, local communities and wider society;
- analyse and interpret the layers of meaning and symbolism within religious stories, rituals, art, dance and music.

### EXPRESS

Pupils should be given opportunities to:

- communicate religious ideas and concepts using reasoned argument, personal opinions and ideas in a variety of ways;
- explain how their learning about religious and spiritual experience and moral decision-making has affected their own and others' views;
- appreciate, respect, empathise with and evaluate the viewpoints of others, acknowledging similarities and differences;
- recognise and explore the spiritual aspects of life;
- use a range of religious language appropriately;
- use ICT to gain access to information and to communicate ideas.

# KEY STAGE 3

## PROGRAMME OF STUDY - RANGE

Pupils should be given opportunities to develop their skills within the following contexts for study, all of which should be explored during the key stage. These should not be studied discretely but interwoven to provide opportunities for pupils to engage, explore, and express.

### THE WORLD

#### *Life and its origins*

religious views about the origins of the world and contemporary debate about the value and purpose of life. *For example, creation stories; medical ethics.*

#### *The natural world and living things*

why religions acknowledge the importance of taking responsibility for the natural world and living things and how they put their beliefs into action. *For example, attitudes towards the environment; social action.*

### HUMAN EXPERIENCE

#### *Human identity*

exploring personal identity and how religions view humans in relation to the rest of creation. *For example, "who am I?" "made in the image of God"; free will; rights and responsibilities.*

#### *Meaning and purpose of life*

how and why religion is considered to provide insight into questions of truth, meaning, purpose and value. *For example, the purpose of life; life after death; suffering.*

#### *Belonging*

how and why people express religious identity and demonstrate commitment through worship, celebration, and lifestyle. *For example, commitment to a faith community; joining ceremonies; religious dress; festivals.*

#### *Authority and influence*

investigating sources of religious authority and their influence on the lives of believers. *For example, sacred texts; religious leaders both past and present; faith communities.*

#### *Relationships and responsibility*

how religions demonstrate rules for living, give guidance on making difficult moral decisions and recommend ways to develop personal relationships. *For example, right and wrong; key religious moral codes; religious attitudes to conflict, war and peace; religious perceptions of marriage.*

#### *The journey of life*

exploring the roles, responsibilities and commitments of religious believers at different times of their lives. *For example, birth ceremonies, food regulations, fasting, pilgrimage.*

### SEARCH FOR MEANING

#### *Exploring spirituality*

why the spiritual side of life is important to some. *For example, belief in God; do we have a soul? feelings of awe, wonder and mystery; near death experiences; feelings of transcendence; religious belief about the after-life.*

#### *Responding to spiritual experience*

how and why people act on their spiritual experience. *For example, demonstrating love, forgiveness, repentance; acts of charity; service to the community; lives sacrificed for others; expressing themselves in art, music, poetry, worship.*

#### *Developing personal beliefs and values*

how and why people search for truth, meaning and ultimate values in life and come to believe in the possibility of a spiritual dimension. *For example, experiences of God; prayer; meditation; contemplation; reflection; miracles; pilgrimage; awe and wonder; personal vision.*



# KEY STAGE 4 and POST-16 PROGRAMME OF STUDY - SKILLS

At Key Stage 4 religious education builds on the skills, knowledge and understanding acquired during key stage 3. The programme of study reflects the requirements of current GCSE qualifications, and both the KS4 and Post-16 programmes of study relate to the 14–19 Learning Core and/or other appropriate qualifications.

At Key Stage 4 and Post-16, religious education stimulates learners to engage with fundamental questions and issues that relate to their individual needs, reflect the social, moral, spiritual and religious climate of contemporary society and the modern world, and motivate and challenge their own and others' thinking.

Learners use a more extensive range of higher order skills to investigate philosophical, ethical, social, moral and religious issues and the perspectives provided by the beliefs, teachings and values of religious traditions.

As they explore their own experiences and opinions, and consider their personal responses in dialogue with others, they engage with more profound and challenging questions.

*At Key Stage 4, learners will develop the three core skills in a study of Christianity and one other principal religion of the school's choice. At Post-16, learners will study at least Christianity and Buddhism.*

ENGAGING WITH FUNDAMENTAL QUESTIONS	CORE SKILLS IN RE EXPLORING RELIGIOUS BELIEFS, TEACHINGS AND PRACTICES	EXPRESSING PERSONAL RESPONSES
This involves raising and responding to fundamental questions. These are human and religious questions that focus on the search for meaning, significance and value in life.	This includes exploring religious stories, sacred texts, celebrations, lifestyle, rituals and symbolism, which provide the perceptions of faith communities to fundamental questions.	This is concerned with respectful consideration and evaluation of the experiences, values and beliefs of others and the questions these raise, and the ability to express one's own feelings and beliefs.

ENGAGE	EXPLORE	EXPRESS
<p>Pupils should be given opportunities to:</p> <ul style="list-style-type: none"> <li>ask, discuss and respond to fundamental questions raised by their own experiences, the world around them and aspects of religion;</li> <li>investigate fundamental questions from a variety of informed sources to evaluate a range of possibilities and begin to draw reasoned conclusions based on the evidence gathered;</li> <li>individually and with others, use a range of higher order skills to challenge preconceptions and consider possibilities;</li> <li>evaluate and justify arguments and points of view while recognising that the conclusions are only partial, inconclusive and open to different interpretations.</li> </ul>	<p>Pupils should be given opportunities to:</p> <ul style="list-style-type: none"> <li>recall, describe, and explain the beliefs, teachings and practices of the religions investigated;</li> <li>make and investigate the links between beliefs, teachings and practices to demonstrate an understanding of religious ideas and concepts;</li> <li>recognise and explain why religious concepts are interpreted in a variety of ways and are manifested in different beliefs, teachings and practices;</li> <li>evaluate critically the impact of religion on the lives of individuals, communities and society.</li> <li>analyse, interpret and evaluate the layers of meaning and symbolism within religious stories, rituals, art, dance and music</li> </ul>	<p>Pupils should be given opportunities to:</p> <ul style="list-style-type: none"> <li>communicate religious ideas and concepts using reasoned argument, personal opinions and ideas in a variety of ways;</li> <li>evaluate how learning about the varieties of religious and spiritual experience and moral decisions might impact on their own and other people's lives;</li> <li>appreciate, respect, empathise with and evaluate the viewpoints of others so that they may draw their own reasoned conclusions;</li> <li>recognise, explore and reflect on interpretations of the spiritual side of life;</li> <li>use a wide range of religious vocabulary in context and demonstrate a developed understanding of symbolism;</li> <li>use ICT and other means to gain access to information, to communicate religious concepts.</li> </ul>

# KEY STAGE 4

## PROGRAMME OF STUDY - RANGE

Pupils should be given opportunities to develop their skills within the following contexts for study, all of which should be explored during the key stage. These should not be studied discretely but interwoven to provide opportunities for pupils to engage, explore, and express.

### THE WORLD

#### *Life - its purpose and value*

the reciprocal influence and impact of religion on relationships, communities and cultures in Wales, Europe and the World. *For example, marriage customs, attitudes to the media and advertising; lifestyle tensions; relationships; conflict with the state; multi-cultural issues.*

#### *The natural world and living things*

ways in which religion inspires people to take action within the local and global community. *For example, local, national and global aid agencies; the influence of religion on citizenship; stewardship; sustainability; animal rights; sanctity of life.*

### HUMAN EXPERIENCE

#### *Human identity*

ways in which religion views what it is to be authentically human. *For example, aspects of justice, equality, fairness; conscience; altruism; consciousness.*

#### *Meaning and purpose of life*

issues of truth, meaning, purpose and value in religion. *For example, good and evil; free will; fate; suffering; innocence; hope; life after death; natural disasters; scientific and religious truth; use and abuse of wealth.*

#### *Belonging*

ways in which religion inspires commitment, engagement, dedication, reflection and aspiration. *For example, use of time; career choices; expressions of faith through action, meditation and worship;*

#### *Authority and influence*

the part played by religion in the decision making process of individuals and communities in Wales, Europe and the World. *For example, religious freedom; freedom of speech; civil rights; war and peace; abortion; censorship.*

#### *Relationships and responsibility*

the effect that religion has on the personal, social and moral development of oneself and others. *For example, rules for living; rights and duties; embracing diversity; gay rights; marriage and divorce; imposed and intrinsic responsibility; tensions between personal preference and religious duty.*

#### *The journey of life*

how religion affects the way that believers live their lives. *For example, rites of passage; religious dress; peer influence and pressure; priorities.*

### SEARCH FOR MEANING

#### *Exploring spirituality*

religious and spiritual experiences. *For example, conversion experiences; the value of a spiritual experience; contemporary cults.*

#### *Responding to spiritual experience*

how and why people act on their spiritual experience. *For example, changes in personal priorities and values; religious responses to discrimination and injustice.*

#### *Developing personal beliefs and values*

how and why people search for truth, meaning and ultimate values in life and come to believe in the possibility of a spiritual dimension. *For example, why believe in God? loss and bereavement; prayer; meditation.*



# POST-16

## PROGRAMME OF STUDY - RANGE

Pupils should be given opportunities to develop their skills within the following contexts for study, all of which should be explored during the key stage. These should not be studied discretely but interwoven to provide opportunities for pupils to engage, explore, and express.

### THE WORLD

#### *Life - its purpose and value*

ways in which religion emphasises the value and worth of human existence. *For example, motives, decisions and consequences; exploitation and modern slavery; fair trade/equality/justice; sanctity of life.*

#### *The natural world and living things*

religious justifications and objections to the use and abuse of the natural world and living things. *For example, medical ethics; interpretations of natural law; treatment of animals; organic/genetically modified.*

### HUMAN EXPERIENCE

#### *Human identity*

questions about religious certainty and truth in contemporary society. *For example, interpretations of God; truth and honesty in the media related to religious issues; changing views about religion throughout life;*

#### *Meaning and purpose of life*

ways in which religious and contemporary values and ideas influence self-worth and perception of others. *For example, media portrayal of God, religion and morality; media depiction of role models; inspirational figures and celebrities; science and religion.*

#### *Belonging*

Wales and the global village's implications for religion. *For example, multicultural society; pluralism; richness and diversity; global accessibility; changing values and relationships; rise of electronic communication; role of men and women in religion.*

#### *Authority and influence*

ways in which religious and secular authorities respond to and use the contemporary media and entertainment industries. *For example, videos and music; portrayal of violence and sexual behaviour; use and abuse of the Internet.*

#### *Relationships and responsibility*

the ways in which religion impacts on global harmony/discord. *For example, democracy/theocracy; liberation theology; war and peace; terrorist/martyr/freedom fighter; political stances linked to religious traditions.*

#### *The journey of life*

theistic and non-theistic interpretations of creation and the purpose of humanity. *For example, nature versus nurture; interpretations of fate, destiny, salvation and providence.*

### SEARCH FOR MEANING

#### *Exploring spirituality*

traditional and contemporary definitions and understanding of religious experience and spirituality. *For example, religious sects; is religion neurobiological and psychological?*

#### *Responding to spiritual experience*

the impact of religious /spiritual experience on individuals and the wider community and the responses which confirm or contest these. *For example, near death experiences; changed lifestyles; challenging traditional laws and mores; sources of religious experiences.*

#### *Developing personal beliefs and values*

how and why people search for truth, meaning and ultimate values in life and come to believe in the possibility of a spiritual dimension. *For example, revelation; faith, doubt and disbelief; mysticism; spiritualism; meditation.*



# LEVEL DESCRIPTIONS

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Engaging with fundamental questions

Exploring religious beliefs, teachings and practices

Expressing personal responses

## LEVEL 1

Pupils talk about their own experiences, the world around them and aspects of religion. They recall and respond to some basic religious beliefs, teachings and practices investigated. They show some awareness that these aspects of religion are special. They recognise that their feelings, actions and opinions may be similar to or different from those of other people. On occasion, they use simple religious vocabulary appropriately to express their ideas.

## LEVEL 2

Pupils ask questions about their own experiences, the world around them and aspects of religion, and suggest some answers. They recall and communicate simply some of the basic religious beliefs, teachings and practices investigated. They suggest, in simple terms, why these aspects of religion are important to some people. They talk in simple terms about their own feelings, actions and opinions and those of other people. They use simple religious vocabulary appropriately.

## LEVEL 3

Pupils discuss the questions raised by their own experiences, the world around them and aspects of religion, giving their own opinions. They describe some of the basic religious beliefs, teachings and practices investigated. They describe how some of these aspects of religion affect believers' lives. They describe their own feelings, actions and opinions, and in simple terms comment on the viewpoints of others. They begin to recognise that religious symbols carry meaning, and use religious vocabulary appropriately.

## LEVEL 4

Pupils discuss their own and others' responses to questions about life, the world around them and religion. They describe and begin to explain the religious beliefs, teachings and practices investigated. They give specific examples of the ways in which these aspects affect believers' lives and begin to identify the similarities and differences within religions. They explain in simple terms how their own feelings, actions and opinions differ from those of others. They recognise some religious symbols and use a range of religious vocabulary appropriately.

## LEVEL 5

Pupils express and justify ideas and opinions about fundamental questions in the light of their investigations and experiences. They make links between the religious beliefs, teachings and practices studied, describing the impact on believers' lives and identify the similarities and differences within and across religion. They explain how their own feelings, actions and opinions affect their own lives, and describe how those of others similarly affect their lives. They use a range of religious vocabulary appropriately and demonstrate a basic understanding of symbolic language.

# LEVEL DESCRIPTIONS

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Engaging with fundamental questions

Exploring religious beliefs, teachings and practices

Expressing personal responses

## LEVEL 6

Pupils draw on a variety of informed sources and their own experiences in order to present evidence and develop appropriate responses to fundamental questions. They use their understanding of the links between the religious beliefs, teachings and practices investigated to consolidate their understanding of religion and to explain differing religious viewpoints. They explain the relationship between their own beliefs and actions. They also explain the relationship between other people's beliefs and actions. They use a range of religious vocabulary appropriately and demonstrate an understanding of symbolism and symbolic language.

## LEVEL 7

Pupils investigate fundamental religious and moral questions from a variety of religious perspectives and begin to draw reasoned conclusions. They apply a wide range of religious concepts to a variety of beliefs, teachings and practices. They accurately explain and justify the reasons for the range of viewpoints held by religious people. They consider the implications of their own beliefs and actions, compare these to other people and draw balanced conclusions. They use a range of religious vocabulary appropriately and are able to explain the symbolic meaning of religious objects, actions and/or language.

## LEVEL 8

Pupils investigate fundamental religious and moral questions, evaluate a range of possibilities and draw rational conclusions based on evidence gathered. They demonstrate an understanding of a wide range of religious concepts, including various perspectives on beliefs, values and traditions within the religions studied. They evaluate the various aspects of religion and explain how these affect the lives of individuals, communities and society. They investigate the religious concepts studied, evaluating their own and other people's viewpoints through reasoned argument and evidence. They use a wide range of religious vocabulary appropriately and demonstrate a developed understanding of symbolic language.

## EXCEPTIONAL PERFORMANCE

Pupils acknowledge that fundamental religious questions are often complex and that answers are often partial and inconclusive. They analyse and give reasons for the different perspectives held concerning the beliefs, values and traditions of the religions studied, recognising the differences between religions and appreciating the tension of unity and plurality within each religion. They have a detailed knowledge and understanding of the behaviour and beliefs of adherents of various faith systems. In relation to the religious and moral concepts studied, they express well-considered opinions of the viewpoints of others based on in-depth investigation. They use an extensive range of religious vocabulary appropriately and demonstrate a well-developed understanding of symbolic language.



# **Agreed Syllabus for Religion, Values and Ethics**

## **Curriculum for Wales Religion, Values and Ethics**



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## **Foreword**

Cardiff is a good place for many of its children and young people to grow up, with a fast-improving school system alongside the advantages that a capital city can bring. However, Covid-19 has further exacerbated existing inequalities, with the daily lives of all children and young people disrupted by the pandemic – particularly the most vulnerable children. As the city emerges from the Covid-19 crisis, the Council is committed to a child friendly recovery; understanding the lived experience of children and putting their voice, needs and rights at the heart of what we do. A key part of this agenda is to ensure the well-being of all children, particularly the most vulnerable children, young people and families whilst securing the best possible outcomes.

Continuing to deliver the goals and commitments outlined in the ambitious Cardiff 2030 vision will continue to be a priority, including National reforms in Additional Learning Needs and Curriculum.

As a part of this goal and commitment, Cardiff Council convened an Agreed Syllabus Conferences, in 2022, to devise the new locally determined Agreed Syllabus for Religion, Values and Ethics (RVE) to fit the Curriculum for Wales Act 2021. With the four purposes as a shared vision and aspiration for every child and young person, we recognise that RVE is one of the four statutory requirements of the Curriculum for Wales and is mandatory for all learners from ages 3 to 16. It is integral to the Humanities Area of Learning and Experience (AoLE), as well as providing a unique and distinct contribution to the Curriculum for Wales.

All schools and settings within the Cardiff area must have ‘regard to’ this locally Agreed Syllabus for RVE when designing and implementing their curriculum and RVE must be clearly evidenced through school’s curriculum design and planning processes. The Cardiff Agreed Syllabus Conferences brought a working party of teachers, representatives from faith and non-religious groups, local authority officers and experts in the field of RVE to create the new locally RVE Agreed syllabus. This Agreed Syllabus will support schools across the Cardiff area to plan and deliver engaging and effective RVE. The ASC and working party ensured that the vision of the four purposes of the Curriculum for Wales, as well as the principles of curriculum design, were central to the locally Agreed Syllabus. It is recognised that as an integral part of the Curriculum for Wales, RVE can offer a distinctive contribution to the realisation of the four purposes for all learners through a curriculum which provides extensive experiences, depth and breadth of challenge, gives real life context for learning and is localised to meet the needs of all learners within individual or cluster settings.

I would like to take this opportunity to thank everyone involved in the creation of this document and to those who will subsequently provide support in the development of engaging RVE for all of our learners within the Cardiff schools and settings.

**Melanie Godfrey**

**Director of Education & Lifelong Learning**

Cardiff County Council

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*All information highlighted in 'grey' has been taken directly from the Hwb website. Links are provided.*

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## **Audience**

The Cardiff Religion, Values and Ethics Agreed Syllabus has been written to be accessible to all those responsible for designing and delivering the RVE curriculum. The intended audience includes:

- the headteacher of a maintained school or a maintained nursery school
- the governing body of a maintained school or a maintained nursery school
- a provider of funded non-maintained nursery education
- the teacher in charge of a pupil referral unit
- the management committee for a pupil referral unit
- a person who provides teaching and learning for a child, otherwise than at a maintained school, maintained nursery school or pupil referral unit, by virtue of arrangements made under section 19A of the Education Act 1996 (c. 56)
- the Cardiff local authority in Wales

In addition, the Agreed Syllabus may also be useful to practitioners, regional consortia, awarding bodies, Estyn, teacher unions, religious organisations, non-religious organisations, parents and carers and other bodies in Wales with an interest in RVE.

## **Overview**

### **Agreed syllabus**

*“As RVE is a locally determined subject, the agreed syllabus specifies what should be taught in RVE within each of the 22 local authorities in Wales for those schools that teach the agreed syllabus.”*

### [Guidance for RVE](#)

This document sets out the details regarding the mandatory element of Religion, Values and Ethics (RVE) in line with the Curriculum for Wales, for all Cardiff schools and settings maintained by the local authority. This document has been adopted as the Agreed Syllabus for RVE in Cardiff, in accordance with the Curriculum and Assessment (Wales) Act 2021.

Cardiff Local Authority has adopted this document as the Agreed Syllabus for RVE in July 2022, following a formal recommendation to the local authority by the Agreed Syllabus Conference on 29<sup>th</sup> June 2022.

*“Once an agreed syllabus has been adopted, all maintained schools and settings are required to have regard to the agreed syllabus including schools of a religious character, in their design of the agreed syllabus element of their RVE provision.”* [Guidance for RVE](#)

All maintained schools in Cardiff are required to **‘have regard’** to the Agreed Syllabus for RVE when designing their curriculum. The Local Authority has a duty to review the Agreed Syllabus every five years and has determined to review the Agreed Syllabus before this five year cycle to continue to support practitioners as updated qualifications are published.

The Cardiff Agreed Syllabus recognises that the approach of the Curriculum for Wales Framework is based on the principle of **subsidiarity** and, as such, the Cardiff Agreed Syllabus recognises and reflects the autonomy of each school and setting in realising its own curriculum. The Agreed Syllabus is not intended to be a scheme of work. It provides a framework within which each school can best

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design its own curriculum which includes RVE within the Humanities Area of Learning and Experience.

### **Implementation**

This Cardiff Agreed Syllabus will be effective from **September 2022**, for Religion, Values and Ethics in respect of all learners, up to and including year 6. In respect of year 7 learners, schools in the region will have flexibility on whether to roll out the Curriculum for Wales in September 2022, or to roll out the Curriculum for Wales for years 7 and 8 together in September 2023. During the period of curriculum roll out, as a secondary school or setting ‘adopts’ the Curriculum for Wales Framework for a particular year group, this Cardiff Agreed Syllabus will supersede the current/legacy Cardiff Agreed Syllabus. From September 2023, this new Agreed Syllabus, in respect of years 7 and 8 as all schools and settings will have implemented the Curriculum for Wales for those learners. Thereafter, the phased roll-out of the Curriculum for Wales will continue, and this Cardiff Agreed Syllabus will supersede the other:

- year 9 learners in September 2024
- year 10 learners in September 2025
- year 11 learners in September 2026

More information for schools and settings on the process for opting in to the Curriculum for Wales in respect of year 7 learners is provided in the [‘Journey to curriculum roll-out’](#).

### **Vision for Cardiff Religion, Values and Ethics**

All children and young people in Cardiff to experience high quality RVE education and develop the knowledge, skills and attributes that enable them to become personally successful, with the skills for lifelong learning and globally engaged citizens, in line with the vision of the Cardiff 2030 child friendly city. The [four purposes](#) are the shared vision and aspiration for every child and young person within the Curriculum for Wales Act 2021.

In fulfilling these, we set high expectations for all, promote individual well-being, tackle ignorance and misinformation, and encourage critical and civic engagement. A school’s RVE curriculum is everything a learner experiences in pursuit of the four purposes. It is not simply what RVE we teach, but how we teach it, and crucially, why we teach it.

Cardiff schools and settings have this new opportunity to re-engage with rich Religion, Values and Ethics (RVE) for all learners. RVE undoubtedly offers:

- a unique and vital element in the education of all learners;
- a chance to encourage all learners to know and understand their communities and the world around them;
- the means to develop an understanding of religious and non-religious philosophical convictions within a pluralistic society;
- the opportunity to become informed and respectful instigators of social change and justice.

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## **Values Cardiff ASC are committed to:**

- As a Child-Friendly City, Cardiff values, and seeks to embed, the rights of children, as shown in the United Nations Convention of the Rights of the Child. This includes articles 13 and 14.
  - **Article 13. Sharing thoughts freely:** *Children have the right to share freely with others what they learn, think and feel, by talking, drawing, writing or in any other way unless it harms other people.*
  - **Article 14. Freedom of thought and religion:** *Children can choose their own thoughts, opinions and religion, but this should not stop other people from enjoying their rights. Parents can guide children so that as they grow up, they learn to properly use this right.*
- Respecting the rights of all children and young people and actively listening to them and involving them in their RVE curriculum.
- The development of happy, well informed and resilient learners, through a focus on RVE academic achievement, personal well-being and progression beyond school.
- Equality of opportunity, championing and celebrating the success and life chances of all children and young people, through all learners studying RVE.
- Raising the aspirations of all children and young people and our expectations of what they can achieve, irrespective of their background.
- Embracing and celebrating the religious and non-religious diversity of the city.
- Respecting and protecting our natural environment for the children and young people of today and for generations to come.
- Openness and collaboration in learning about and sharing diverse beliefs and practices.

## **The legal requirement for Religion, Values and Ethics (RVE)**

Cardiff Local Authority welcomes the fact that Religion, Values and Ethics is a **statutory** requirement of the Curriculum for Wales and is **mandatory** for all learners from ages 3 to 16:

### **Mandatory:**

“Religion, values and ethics (RVE) is a statutory requirement of the Curriculum for Wales and is mandatory for all learners from ages 3 to 16. RVE forms part of the Humanities Area. This Area encompasses geography; history; religion, values and ethics; business studies. These disciplines share many common themes, concepts and transferable skills, whilst having their own discrete body of knowledge and skills.” Guidance for RVE

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It is essential that Headteachers, senior leaders and governors understand the legal requirements of RVE within the Curriculum for Wales. These can be found in the RVE section of the Summary of legislation.

**The RVE Legislation Guidance can be accessed via the Welsh Government's Hwb website:**

<https://hwb.gov.wales/curriculum-for-wales/summary-of-legislation/#religion,-values-and-ethics>

The guidance on RVE is **statutory**:

“The guidance on RVE contained within the Humanities Area is statutory and published under section 71 of the Curriculum and Assessment (Wales) Act 2021 (the Act) and designed to assist those responsible under the Act for designing the RVE syllabus as part of the school curriculum.” Summary of Legislation, Hwb

The Cardiff Agreed Syllabus follows the Religion, Values and Ethics statutory Guidance on Hwb and forms the basis of this Cardiff Agreed Syllabus and is to be read in conjunction with this document.

**The RVE Statutory Guidance can be accessed via the Welsh Government's Hwb website:**

<https://hwb.gov.wales/curriculum-for-wales/humanities/designing-your-curriculum/#religion,-values-and-ethics-guidance>

The statutory RVE guidance includes vital information for schools when designing their curriculum at a local level, including the following areas:

- RVE within the Curriculum for Wales
- Spiritual development
- Cross-cutting themes
- Cross-curricular skills
- Skills integral to the four purposes
- Principles of Progression within humanities
- Descriptions of learning within humanities

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- Designing your curriculum for RVE
    - RVE and the four purposes
    - RVE and the statements of what matters
    - RVE concepts
    - The RVE lens (sub lenses in RVE)
    - Learner progression and learning journeys in RVE
    - Enriching learner experience in RVE
    - Key links with other Areas
    - Points to consider for schools and settings
  - Ensuring inclusivity in RVE
  - Education in funded non-maintained nursery settings
  - Education other than at school

Cardiff schools and settings are reminded that in accordance with the Curriculum and Assessment (Wales) Act 2021 this Cardiff Agreed Syllabus reflects that:

- the religious traditions in Wales are in the main Christian while taking account of the teaching and practices of the other principal religions represented in Wales
- the fact that a range of non-religious philosophical convictions are held in Wales

Schools and settings developed RVE curricular in Cardiff should ‘pay regard to’ and reflect the diverse and pluralistic nature of religious and non-religious beliefs that are present in the community of Cardiff.

Cardiff schools and settings are also reminded of the following legislative changes which will have a significant impact on schools:

- Maintained schools with nursery age children and funded non-maintained nursery settings must provide RVE for all their learners from age 3 from September 2022.
- Post 16 RVE in maintained schools is optional for sixth formers from September 2027.
- There is **no** parental right to withdraw their children from the academic subject of RVE within the Curriculum for Wales. In the Curriculum for Wales RVE is a statutory requirement for all learners from age 3 to 16. The timetable for these changes is as follows:
  - Primary aged pupils – September 2022
  - Year 7 learners – September 2022 OR September 2023, depending upon when the school/setting rolls out their Curriculum for Wales
  - Year 8 learners – September 2023
  - Year 9 learners – September 2024



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- Year 10 learners – September 2025
  - Year 11 learners – September 2026

This is in line with every other academic subject in the Curriculum for Wales.

Note that parents may still request that their children are withdrawn from 'collective worship' from September 2022, if they wish, as this is distinct and separate from the academic subject of RVE.

## **Designing your Religion, Values and Ethics Curriculum**

Schools are advised to use the most up-to-date information on Hwb to support their curriculum design.

Each school and setting will need to decide how RVE best works within their approach to the Humanities Area. For example, RVE curriculum design can be integrated, multidisciplinary, interdisciplinary or as a discrete discipline. Curriculum design should be evaluated regularly in line with the Curriculum for Wales Framework. All schools and settings must 'have regard' to this locally Agreed Syllabus for RVE when designing their curriculum.

The area on the Humanities Area of Learning Experience (AoLE) is also crucial for designing a RVE curricular.

Here you will find the following areas:

1. Introduction
2. Statements of what matters (mandatory)
3. Principles of progression (mandatory)
4. Descriptions of learning
5. Designing your curriculum

The section on 'designing your curriculum' has the following information that practitioners will also find useful:

- Cross-curricular skills and integral skills
- Specific considerations for this Area
- Key links with other Areas
- Cross-cutting themes

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There are other areas of the Curriculum for Wales, RVE Summary Legislation and RVE Guidance that will advise and guide schools and settings. Here are some of those areas that can be found in the RVE Guidance:

- Religion, Values and Ethics Post 16
- Enriching Learner Experience in Religion, Values and Ethics
- Spiritual Development and Religion, Values and Ethics
- Ensuring Inclusivity in Religion, Values and Ethics
- Religion, Values and Ethics in Funded Non-maintained Nursery Settings
- Religion, Values and Ethics for Education other than at School

### **RVE and Prevent within the Cardiff Region**

Prevent is a whole-school safeguarding responsibility; however, Religion, Values and Ethics (RVE) plays a pivotal role in building resilience and awareness among learners to help keep them safe from the risks of radicalisation and extremism due to the nature of RVE and therefore addressing some of the primary Prevent objectives. Cardiff is a Home Office Prevent priority area, therefore Cardiff schools and settings should consider how an RVE curriculum can support the safeguarding of learners from the risks of radicalisation and extremism.

See the supporting materials document for the Cardiff Agreed Syllabus for RVE for more detail, guidance, and contact details of the local Prevent team to aid in curriculum development.

### **Additional Supporting Materials for Cardiff Schools and Settings**

Cardiff County Council Local Authority and the Cardiff Standing Advisory Council for RVE (SAC) will continue to provide supporting materials, in addition to this Agreed Syllabus. These will be regularly updated and are designed to provide ongoing support for practitioners. These are intended to be 'live' and working documents, materials and resources to reflect the evolution of the Curriculum for Wales.

The local authority and Cardiff SAC welcome contributions and suggestions for the additional supporting materials. Working committees may be set up to support the development of these materials. If there are any queries, please contact the Clerk to SAC at: [SACRE@cardiff.gov.uk](mailto:SACRE@cardiff.gov.uk)

The function of the Standing Advisory Council on RVE is to advise the local authority on such matters connected with the provision of teaching and learning, under the Curriculum and Assessment (Wales) Act 2021, either in respect of the mandatory element of RVE, or the post-compulsory education in maintained schools of optional RVE. In addition, the SAC may advise on any other matter the LA may refer to it, or as the SAC may see fit.

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**Further guidance and enquiries about this document should be directed to:**

[SACRE@cardiff.gov.uk](mailto:SACRE@cardiff.gov.uk)

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**Revised Constitution of SACRE/SAC for RVE,**  
**October 2022**

**CARDIFF COUNCIL STANDING ADVISORY COUNCIL FOR RELIGIOUS EDUCATION (SACRE) / STANDING ADVISORY COUNCIL (SAC) ON RELIGION, VALUES AND ETHICS**

**CONSTITUTION AND STANDING ORDERS**

Purpose of Committee & Terms of reference

1. To advise the LA on matters connected with collective worship in county schools.
2. To advise the LA on matters connected with religion, values and ethics education which is given in accordance with the agreed syllabus.
3. To decide when, within the five year statutory time scale, the LA should review its agreed syllabus.
4. To consider with the LA and the Agreed Syllabus Conference any changes required to the agreed syllabus.
5. To consider with the LA the support offered to religious education/ religion, values and ethics in its schools, with particular regard to curriculum design and pedagogy and the provision of training for practitioners.
6. To offer advice on any other matters related to its function as it sees fit.
7. To publish an annual report on its work by 30<sup>th</sup> December of the academic year following the period of the report which should:
  - a. specify any matters on which it has advised the LA;
  - b. broadly describe the nature of the advice;
  - c. set out its reasons for offering advice on any matters which were not referred to it in the first place by the LA;
  - d. record the membership of SACRE/SAC for RVE and the dates of meetings held.
  - e. Be noted at a meeting of Full Council each year.
9. To participate in the LA's statutory complaints procedures in those instances where the complaints relate to religion, values and ethics and/or collective worship.
10. To receive and make determinations in respect of applications from head-teachers of county schools for the lifting or modifying of the requirements that collective worship in such schools must be wholly or mainly of a broadly Christian character.

## Composition

11. The SACRE/SAC for RVE shall comprise three voting groups representing:

### **Group A**

Such Christian and other religious denominations as, in the opinion of the LA, will appropriately reflect the religious traditions in the area and also such persons who represent holders of non-religious philosophical convictions in the same way as they permit the appointment of holders of religious beliefs (section 390 (4) (a) of, and paragraph 4(2) (1) of Schedule 31 to the 1996 Act.).

The non-religious philosophical convictions adhered to be the person to be appointed must be analogous to a religious belief. To be 'analogous' we consider the non-religious philosophical convictions must in accordance with case law under the European Convention of Human Rights and the Human Rights Act 1998 attain the necessary level of cogency, seriousness, cohesion (Valsamis v Greece, §§ 25 and 27) and importance to attract protection under the Convention Rights.

An appointment is dependent on SACRE's/SAC for RVE opinion as to whether a holder of non-religious philosophical convictions would help ensure that the relevant traditions in the local authority's area are appropriately reflected in Group A. The final decision of an appointment rests with SACRE/SAC for RVE, as they are best placed to assess whether the SACRE/SAC for RVE has the necessary expertise and experience to properly discharge its function.

The relevant statutory provision gives discretion to the authority to determine which religious groups will appropriately reflect the principal religious traditions of the area. The statutory provisions, therefore, recognise there will be occasions when the interest of efficiency overrides the requirement for directly proportionate representation.

16 places specifically:

The Church in Wales	1 member
The Roman Catholic Church	1 member
Free Churches	5 members
Bahá'í Faith	1 member
Buddhism	1 member
Hinduism	1 member
Islam	1 member
Judaism	1 member
Sikhism	1 member
Humanism	1 member
Additional religions, non-religious philosophical convictions or denominations other than those specified above	2 members

### **Group B**

Such associations representing teachers as, in the opinion of the LA, ought to be represented having regard to the circumstances of the area.

The relevant statutory provision gives discretion to the authority to determine which associations are to represent practitioners. There would be advantage in ensuring that members representing associations of teachers include practitioners of religious education/religion, values and ethics.

Eight places from as broad a range of teacher associations as possible whilst recognising that in the interest of the effective running of the committee there may be periods where some teacher associations may be more heavily represented than others.

Associations might include:

- NAHT
- UCAC
- NEU
- NASUWT
- SHA

### **Group C**

The Local Authority: Five places

### **Co-opted Members**

12. SACRE/SAC for RVE may also appoint co-opted members as the SACRE/SAC for RVE may decide will assist it in the performance of its functions, up to a maximum of four such members.

Members of SACRE/SAC for RVE should consider the following when co-options are decided. Candidates should generally:

- a) have some experience as educators, and ideally experience of religious education/religion, values and ethics
- b) have a balanced view of the aims of religious education/religion, values and ethics and collective worship
- c) where possible, be representative of specific education phases, to provide a balanced spread across various phases
- d) be able to assist SACRE/SAC for RVE in the performance of its functions, and offer insight into matters relating to the SACREs/SAC for RVE current priorities

SACRE/SAC for RVE will decide co-options following nominations from members of SACRE/SAC for RVE or representative groups.

Co-opted members shall hold office on such terms as may be determined at the time of co-option by the representative members and shall hold office at the pleasure of, and may be removed at any time by, the representative members.

SACRE/SAC for RVE shall review its co-opted members on an annual basis, ensuring that co-options serve the current needs and priorities of the SACRE/SAC for RVE.

13. Membership of Groups A, B and C on SACRE/SAC for RVE shall be for a period of four years. Any outgoing members may be re-appointed.
12. The terms of office for the Chair and Vice Chair will be for one year and that the Chair shall be appointed from the Local Authority and the Vice Chair from the faith group.
13. Membership of the SACRE/SAC for RVE is subject to the condition that the LA has taken all reasonable steps to assure itself that the persons appointed are representative, as the case may be, of the denominations, faith or belief communities, or such persons who represent holders of non-religious philosophical convictions or associations in question.
14. Members representing associations of teachers should include practitioners of religious education/religion, values and ethics.
15. Individuals may be removed from the SACRE/SAC for RVE if they cease to be representative of the denomination, faith or belief community or such persons who represent holders of non-religious philosophical convictions or association or of the Authority they were appointed to represent.
16. Any member of the SACRE/SAC for RVE may at any time resign his or her office.
17. Any member who fails to attend two consecutive meetings without apology or send a representative (subject to point 27) will cease to be a member. An individual who is so disqualified shall not be precluded from being re-appointed by the appropriate nominating body.
18. Supply cover and travel expenses will be paid for practitioners attending meetings (representing their unions/teacher associations) and any practitioners who are attending the meeting as faith representatives. Travel expenses will be paid to any other members who cannot otherwise claim expenses from their nominating body.
19. Cardiff SACRE/SAC for RVE is a member of WASACRE (the Welsh Association of SACREs). It shall nominate up to four members, including the RE Consultant/SAC for RVE Advisor, to represent the SACRE/SAC for RVE at WASACRE meetings. Supply cover and travel expenses will be paid for practitioners attending WASACRE meetings. Travel expenses will be paid to any other member who cannot otherwise claim expenses from their nominating body. Nominations will be decided at the first meeting of the academic year.

#### Proceedings

22. The SACRE/SAC for RVE shall meet not less than once in each school term. Meetings are open to members of the public. Members will receive at least seven days' notice of any meeting. The minutes of the previous meeting, agenda and any other relevant papers will be provided. Groups A, B and C may hold group meetings as and when required.



23. The SACRE/SAC for RVE shall elect from its membership a chairperson and vice chairperson to stand for one year. The chairperson and vice chairperson in any one year shall not be drawn from the same representative group. An outgoing chairperson may be re-appointed.

On any question to be decided by the SACRE/SAC for RVE only the representative groups on the Council shall be entitled to vote, and each group shall have a single vote. Before a formal vote is taken opportunity shall be given to each representative group to determine how its vote is to be cast. Resolutions will go to the **Education and Social Care Portfolio and then the Executive Business Meeting.**

24. Co-opted members may take part in discussions but are not entitled to vote.
25. The agenda for each meeting shall be determined by the chairperson in consultation with the clerk to SACRE/SAC for RVE, Director of Education Representative and Professional Officer. Any voting member of SACRE/SAC for RVE shall be entitled to propose items for an agenda at least eighteen days prior to any meeting. Only items on the agenda may be considered at any meeting except at the discretion of the chair.
26. In the case of any member not being able to attend a Council meeting, a substitute may attend to represent that member provided that the substitute meets the eligibility criteria and the Education Directorate of the LA and the Clerk to SACRE/SAC for RVE is notified at least five working days in advance of the meeting.
27. A meeting of the SACRE/SAC for RVE will be deemed to be quorate if at least one member of each of the three representative groups is present.
29. The representative groups on the SACRE/SAC for RVE other than that representing the Local Authority, may call, at any time, for a review of the agreed syllabus current in the Local Authority. At such time an Agreed Syllabus Conference shall be constituted and convened.
30. The SACRE/SAC for RVE shall consider its annual report at the first meeting to be held in each academic year. Upon the Council's ratification of the report it shall proceed to publication by 30<sup>th</sup> December of the academic year proceeding the period of the report.
31. The clerk to the SACRE/SAC for RVE shall arrange for copies of the annual report to be sent to all county schools within the Local Authority, to the Welsh Government, the National Library and to such other individuals and institutions as the LA sees fit.

October 2022

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# CARDIFF COUNCIL

## Equality Impact Assessment Corporate Assessment Template

### Appendix 4

**Policy/Strategy/Project/Procedure/Service/Function Title:** Cardiff Standing Advisory Council for Religious Education (SACRE)

**New/Existing/Updating/Amending:** Updating

**Who is responsible for developing and implementing the Policy/Strategy/Project /Procedure/Service/Function?**

Name:	Job Title: N/A
Service Team: Consortium leading	Service Area: Education
Assessment Date: 18/11/22	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

1. To present the existing Cardiff Agreed Syllabus for Religious Education to cabinet for re-adoption for pupils of Religious Education, during the period of Religion, Values and Ethics curriculum rollout,
2. To present the new Cardiff Agreed Syllabus for Religion, Values and Ethics (RVE) to cabinet for adoption and have agreement that schools can start to deliver this agreed syllabus,
3. To agree the revised Terms of Reference for SACRE (Standing Advisory Council for Religious Education) /SAC (Standing Advisory Council)

**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

1. The introduction of the Curriculum and Assessment (Wales) Act 2021 (the Act) established the Curriculum for Wales in law and replaced the previous curriculum (which includes, for example, the national and local curricula set out in Part 7 of the Education Act 2002).
2. The Curriculum and Assessment (Wales) Act 2021 Act sets out 'Religion, Values and Ethics' (RVE) as one of the mandatory subjects which spans the 3 to 16 learning continuum. The subject of RVE forms part of the Humanities Area of Learning and Experience within the Curriculum for Wales. Subject specific Guidance on RVE contained within the Humanities Area of the Curriculum for Wales, is statutory and is published under section 71 of the Act. The guidance is designed to assist those responsible under the Act for designing the RVE

# CARDIFF COUNCIL

## Equality Impact Assessment Corporate Assessment Template

syllabus as part of the school curriculum.

3. The 2021 Act states that Local Authority Standing Advisory Councils for RVE (SACs) and agreed syllabus conferences (ASCs), are still responsible for creation of a locally agreed syllabus. Under the previous curriculum, the Local Authority's SACRE and ASC committees held these responsibilities.
4. Cardiff Council convened Agreed Syllabus Conferences in January, March, and June 2022. The current curriculum was first adopted in 2008. In June 2013 the Agreed Syllabus Conference endorsed the re-adoption of the Cardiff Agreed Syllabus, with an understanding that the syllabus would be reviewed once further information is received in relation to the National Curriculum review.
5. The current Cardiff agreed syllabus for Religious Education was considered suitable for recommendation to be readopted by the local authority.
6. This was in accordance with the legal requirement for a local authority to review and reconsider their agreed syllabus for Religious Education within five years of its adoption or readoption.
7. The Agreed Syllabus Conference are recommending that the Cardiff Agreed Syllabus for Religious Education is readopted for those learners who are not following the Religion, Values and Ethics curriculum, until the implementation of the Curriculum for Wales is completed.

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	Yes		
18 - 65 years		No	
Over 65 years		No	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The new Agreed Syllabus for Religion, Values and Ethics is potentially a great opportunity to promote equality across all protected characteristics and have positive impact.

The vision is for all children and young people in Cardiff to experience high quality RVE education and develop the knowledge, skills and attributes that enable them to become personally successful, with the skills for lifelong learning and globally engaged citizens, in line with the vision of the Cardiff 2030 child friendly city. The [four purposes](#) are the shared vision and aspiration for every child and young person within

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the Curriculum for Wales Act 2021.

In fulfilling these, we set high expectations for all, promote individual well-being, tackle ignorance and misinformation, and encourage critical and civic engagement. A school's RVE curriculum is everything a learner experiences in pursuit of the four purposes. It is not simply what RVE we teach, but how we teach it, and crucially, why we teach it.

Cardiff schools and settings have this new opportunity to re-engage with rich Religion, Values and Ethics (RVE) for all learners. RVE undoubtedly offers:

- a unique and vital element in the education of all learners;
- a chance to encourage all learners to know and understand their communities and the world around them;
- the means to develop an understanding of religious and non-religious philosophical convictions within a pluralistic society;
- the opportunity to become informed and respectful instigators of social change and justice.

**What action(s) can you take to address the differential impact?**

Good communication within the wider community beyond the school and with church leaders of all religions and representatives on SACRE with no religion will be positive so that the benefits can be promoted and understood by all.

**3.2 Disability**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment		No	
Physical Impairment		No	
Visual Impairment		No	
Learning Disability		No	
Long-Standing Illness or Health Condition		No	
Mental Health		No	
Substance Misuse		No	
Other		No	

**Please give details/consequences of the differential impact, and provide supporting**

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<b>evidence, if any.</b>
<b>We do not believe this will impact on this protected characteristic group</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>No action required</b>

**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		No	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>We do not believe this will impact on this protected characteristic group</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>No action required</b>

**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Marriage			N/A N/A
Civil Partnership			

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<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>We do not believe this will impact on this protected characteristic group</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>No action required</b>

**3.5 Pregnancy and Maternity**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Pregnancy			N/A
Maternity			N/A

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>We do not believe this will impact on this protected characteristic group</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>No action required</b>

**3.6 Race**

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
White	Yes		
Mixed / Multiple Ethnic Groups	Yes		
Asian / Asian British	Yes		

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Black / African / Caribbean / Black British	Yes		
Other Ethnic Groups	Yes		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Cardiff is a city with a diverse population – over 30% Minority ethnic and 23% plus have English as an additional language. The RVE curriculum has the potential to promote respect and understanding between different religious and cultural groups.

**What action(s) can you take to address the differential impact?**

Good communication within the wider community beyond the school and with church leaders of all religions and representatives on SACRE with no religion will be positive so that the benefits can be promoted and understood by all.

**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Buddhist	Yes		
Christian	Yes		
Hindu	Yes		
Humanist	Yes		
Jewish	Yes		
Muslim	Yes		
Sikh	Yes		
Other	Yes		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Potentially increase positive understanding of each other's faiths and values and ultimately promote cohesion, understanding and respect



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<b>What action(s) can you take to address the differential impact?</b>
Good communication re changes with all religious groups

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men		No	
Women		No	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
We do not believe this will impact on this protected characteristic group
<b>What action(s) can you take to address the differential impact?</b>
No action required

**3.9 Sexual Orientation**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		No	
Gay Men		No	
Gay Women/Lesbians		No	
Heterosexual/Straight		No	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
There could be positive impact potentially that will be monitored over time.

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With teaching this area of the curriculum well, promoting understanding of different relationships within communities and wider world could have positive impact.

**What action(s) can you take to address the differential impact?**

**3.10 Socio-economic Duty**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

	Yes	No	N/A
		No	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**We do not believe this will impact on this protected characteristic group**

**What action(s) can you take to address the differential impact?**

**No action required**

**3.11 Welsh Language**

Will this Policy/ Strategy/Project/Procedure/Service/Function have a **differential impact (positive/negative)** on the Welsh Language?

	Yes	No	N/A
		No	

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**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

RVE will be delivered in both Welsh and English medium schools

**What action(s) can you take to address the differential impact?**

**4. Consultation and Engagement**

What arrangements have been made to consult/engage with the various Equalities Groups?

Religious representatives have been fully consulted through the Agreed Syllabus Conferences over several months and representatives from the teaching community.

**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	Good communication within the wider community beyond the school and with church leaders of all religions and no

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	religion will be positive so that the benefits can be promoted and understood by all.
Religion/Belief	Good communication re changes with all religious/ non religious groups
Sex	
Sexual Orientation	
Socio-economic Duty	
Welsh Language	
Generic Over-Arching [applicable to all the above groups]	

**6. Further Action**

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

**7. Authorisation**

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Gill James	Date:
Designation: Achievement Leader Education	8/12/22
Approved By:  MIKE TATE	8/12/22
Designation: Assistant Director, Education & Lifelong Learning	
Service Area: Education	

7.1 On completion of this Assessment, please ensure that the form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk).

For further information or assistance, please contact the Equality Team- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)

**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**CABINET MEETING: 15 DECEMBER 2022**

**COUNCIL HOUSING RENT & SERVICE CHARGE SETTING  
2023/24**

**HOUSING & COMMUNITIES (COUNCILLOR LYNDA THORNE)  
AGENDA ITEM: 8**

**Reason for this Report**

1. To seek Cabinet approval for the proposed approach to the setting of rents and service charges on council owned dwellings in the Housing Revenue Account for the financial year 2023/4.
2. To brief Cabinet on how it is proposed to make efficiencies to address the estimated budget deficit in the Housing Revenue Account for 2023/4.
3. To brief Cabinet on the help and support available to tenants who are struggling with the cost-of-living crisis.

**Background**

4. The Housing Revenue Account (HRA) records income and expenditure arising from the provision of Cardiff Council's 13,852 council homes. The HRA is ringfenced for the council's housing landlord functions and cannot be used for other purposes.
5. The main source of income to the HRA is from tenants in the form of rents and service charges. The purpose of reviewing rents is to ensure the Housing Revenue Account has enough income to provide quality housing services for current and future tenants. Rental income allows the service to invest in the maintenance and improvement of existing homes and neighbourhoods; provide good tenant support services; contribute to the funding of our community Hubs and also build new homes.
6. The Renting Homes (Wales) Act 2016 will come into force on 1<sup>st</sup> December 2022. This new legislation requires landlords to give tenants two months' notice of their rent change. Previously only 28 days' notice was required.
7. The reviewing and setting of rent and service charges is normally decided by Cabinet during budget setting in February of each year. To meet the new notice period requirements as laid out in the Act, rent and service charge setting will now need to be decided ahead of the normal budget

process annually going forward. The detail of the HRA budget for 2023/4 and the finalisation of any savings proposals will still be considered as part of the Council's normal budget setting process in February.

### Rent Setting Policy

8. Whilst the responsibility for setting rents rests with the Council, the Welsh Government rent policy framework sets limits and boundaries for this. These rules are as follows:
- When determining the setting of rents and service charges, social landlords must make an assessment of cost efficiencies, value for money and affordability for tenants which should be discussed at Cabinet or Council.
  - The maximum overall rent increase allowable in any one year is the September Consumer Price Index (CPI) +1%. Should CPI fall outside the range of 0% to 3%, the responsibility will rest with the Housing Minister to determine the appropriate change to rent levels for the year.
  - In September 2022, CPI was 10.1%, well above the range allowable by the policy. Therefore, a decision regarding the rent setting was required by the Minister who announced on the 16<sup>th</sup> November 2022 that the maximum that rents can increase by is 6.5%. The Minister confirmed that this was a maximum increase and decision making is with the Council. The Minister also set out a number of commitments made by social landlords to prevent evictions and support tenants, these can be found at paragraph 42.
9. Uncertainty remains about future rent levels, due to the impact of inflation on the policy and the end of the current rent setting framework in 2025. This is a significant risk to the resilience of the HRA as it means that the Council cannot control or effectively predict a key component of HRA business planning.

### Issues

#### Rent Increase Modelling

10. In considering the level of rent increase to apply, three increase options were considered, 2%, 4% and 6.5%, not applying an increase was also considered. In carrying out this review the following issues were considered:

The impact of the rent increase options on tenants, taking into account:

- Whether Cardiff's rents are good value for money
- The affordability of Cardiff's rents
- The support available to tenants

The impact on the HRA business plan including the ability to continue to:

- Support tenants,
- Maintain and improve existing homes
- Build new homes

### Impact of Rent Increase Options on Tenants

11. The impact on average rent levels for each rent increase option is set out below:

#### Average Rent Levels

Average Rent/ Week (52 Week) 2022/3	Increase Rate	Weekly Average Rent Increase (Over 52 Weeks)	New Average Rent/ Week (52 Week) 2023/4
£111.15	0%	£0.00	£111.15
£111.15	2%	£2.22	£113.38
£111.15	4%	£4.45	£115.60
£111.15	6.5%	£7.23	£118.38

12. While any increase in rent is difficult at this time, it should be noted that 84.62% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits. It was also recently announced that increases in pensions and benefits will be in line with inflation.
13. For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team, this support and its success is set out at paragraph 38 to 41.
14. A commitment has also been given that there will be no evictions due to financial hardship for the term of the rent settlement in 2023-24, where tenants engage with officers.

15. Cardiff's rents will continue to represent good value for money, even after the application of the maximum 6.5% increase council rents will still be significantly lower than private sector rents. Council properties are also more energy efficient than private sector properties. (see paragraph 50 below for further information)
16. It has also been demonstrated that rents remain affordable at this higher level, scoring well against the Joseph Roundtree Foundation (JRF) living rents model (see paragraph 46 to 49 below for further information).

### **Impact of Rent Increase Options on the delivery of the HRA Business Plan**

17. The 6.5% maximum allowable rent increase is above the level assumed within the HRA Business Plan for 2023/4, however it is significantly below the rate of inflation. Due to the increase in costs to the HRA all rent increase options open to the Council would result in a revenue shortfall within the HRA. The table below shows this impact:

Rent Uplift %	Income Loss/(Gain) Compared to HRA Business Plan assumption of 3.5% 2023/24	Inflationary cost increase forecasts (Excludes capital programme pressures)		Total Revenue Shortfall/ (Surplus) 2023/24  (High Level Estimate)
		Management and Supervision	Revenue Repairs and Maintenance	
0%	£2.946m	£2.475m	£2.263m	£7.684m
2%	£1.262m	£2.475m	£2.263m	£6.000m
4%	(£421,000)	£2.475m	£2.263m	£4.317m
6.5%	(£2.525m)	£2.475m	£2.263m	£2.213m

18. The following assumptions have been made in producing the above figures:
  - Management and supervision - staffing cost impact is based on the 2022/23 budget uplifted for the latest pay award settlement. In addition, provision is made for an estimated pay uplift for 2023/4.
  - Management and supervision - non staffing cost increase is based on the 2022/3 budget uplifted by estimated average inflationary increases across all budget heads reflecting the current range of pressures.



- Revenue repairs and maintenance costs – have been uplifted by assumed inflationary increases across all budget heads.
  - The assumed rental impact is added to the cost impact to give an overall potential revenue budget shortfall in 2022/3.
19. It should be noted that this is a high level interim assessment of the impact of various factors on the 2023/4 budget and funding requirement. The current volatility in costs and uncertainty as to how these variables are likely to develop make any predictions very difficult at present and these estimates are likely to change over coming months. An up to date assessment of these variables will be included in the detailed budget that will be developed in the next few months to be presented to Cabinet for approval in February 2023.

#### Addressing the budget deficit

20. As can be seen from the table above, a rent freeze would result in an estimated overall shortfall in the HRA budget of £7.684m. Even with the maximum 6.5% rent uplift there is still an estimated budget deficit of circa £2.213m.
21. In anticipation of a below inflation rent increase a full review of the HRA has taken place and a number of areas have been identified where efficiencies can be made. This includes:
- Reduction in staffing- it is anticipated that this reduction can be made by deleting vacant posts or through the voluntary severance process. These changes can be made through efficiencies and no significant service changes will be required.
  - Reduction in non-staffing costs - this includes a reduction in training and events budgets.
  - Reduced capital expenditure and resultant reduction in borrowing costs for 2023/4. This is due to several factors including: the use of external capital grants to offset borrowing in year; a review of spend on some areas of the capital programme including garage improvements and estate regeneration and deferred borrowing resulting from unavoidable delay in parts of the new council house build programme.
  - Reduction in proposed Direct Revenue Financing of the capital programme while allowing for increased borrowing requirements.
22. It is anticipated that the savings identified will mitigate the estimated £2.213m revenue shortfall that would result from the application of the maximum 6.5% rent increase. If a lower rent increase is taken forward then further savings will be needed which would impact on service delivery, the ability to maintain existing homes and to deliver new homes.

23. Additional opportunities for service change that will create savings will continue to be explored next year, including:
- Increased opportunities for digitalisation – including the implementation of the My Repair digital solution and exploration of the use of Allocations Online
  - A review of the Responsive Repairs Service to ensure works are carried out by the most appropriate operatives.
  - Review and alignment of back office services and of senior management roles.
  - Further review of services that are recharged to the HRA.
24. While opportunities for savings will continue to be sought, the impact of any cuts to services and investment in homes at this time would be severe. The service is currently responding to a range of additional pressures, and these are set out below:

### **The need for new Council homes.**

25. It is more important than ever that the Council's ambitious plans of building 2,800 council homes to address housing need are delivered. Like many cities across the UK, Cardiff is experiencing a housing crisis. There are currently over 8,200 households on the Cardiff Social Housing Waiting list. There are 1,454 households currently in temporary and supported accommodation with a further 356 households on a waiting list to enter temporary accommodation. Failure to deliver the planned new housing will result in more homelessness and more families in the city living in overcrowded and unsuitable conditions. The building of new homes is not only an investment for our citizens, but also a financial investment for the Council as the rent will yield an income, that will, in time, repay any borrowing that was required to build the home. In the short term however, revenue is needed to support the capital borrowing required for the new build programme.

### **The need to maintain and improve of existing properties.**

26. The HRA supports the maintenance and improvement of Council housing. This is a statutory requirement and ensures that properties are safe, compliant with regulations and are energy efficient in line with the current Welsh Quality Housing Standards (WHQS). The costs of works are increasing and commissioning capital projects is becoming more challenging and therefore it is vital that there is sufficient funding available to maintain the quality of our existing homes and to meet our legal obligations.
27. Meeting net zero carbon targets in Council homes is high on the agenda not only for Welsh Government through its new WHQS 2023 standard and for the Council's own One Planet Strategy, but also to help to drive down energy costs for tenants. To invest in this retrofitting approach will require significant funding and while grant funding will be sought wherever possible, it is likely that significant future costs will need to be met through the HRA.

## **Increase Demand on Housing Services**

28. There has been a significant increase in the needs of existing council tenants. Tenancy services have seen a 20% increase in demand to support with issues including ASB. The Tenancy Sustainment Team are now also supporting 70 tenants an increase of 7% on same time last year. These tenants are vulnerable individuals who need support to remain in their own homes and to prevent eviction.
29. The Welfare Liaison Team support tenants with budgeting, debt advice and income maximisation. More than ever this team needs to continue to carry out this vital work as the cost-of-living crisis starts to affect more people. Since April 2022, £1.75m in additional benefits has been identified for council tenants by the Welfare Liaison Team, an increase of 38% on the same period in the previous year.
30. The cities Community Hubs are seeing an increase in footfall month on month. These spaces are at the heart of the cities communities and are a vital lifeline to thousands of people. Footfall across our Community Hubs has increased by 130% on the period last year. The Hubs provide advice on housing, homelessness prevention, employment, money as well as holding events for people of all ages to help improve their wellbeing. Hubs are also providing Foodbank vouchers and parcels and Warm Welcome spaces over the winter. Since Warm Welcome Spaces were introduced on 3<sup>rd</sup> October 2022 more than 1,790 customers have accessed the spaces.
31. A rent increase lower than 6.5% would have a significant and ongoing impact on the Council's ability to maintain existing homes and build new homes. Cuts to services would also be required that would impact on the most vulnerable of our tenants.

## **Consultation with Tenants**

32. Consultation with tenants took place between 20<sup>th</sup> October 2022 and 16<sup>th</sup> November 2022. Given the time constraints it was necessary for consultation to take place before the decision of the Minister was received on the maximum rent increase. Given the significant impacts of a below inflation increase in rent, it was decided to consult tenants on:
  - Whether they considered their rents to be good value for money
  - A proposal to set rents at the full amount allowed by Welsh Government, as long as this was demonstrated to be affordable.
33. The Consultation comprised of:
  - An online survey was developed. This was promoted through a wide range of channels, including the Cardiff Tenants website and 13 face to face events were held in Hubs to encourage responses. In addition to this front facing staff who have regular contact with tenants including

the finance, welfare liaison and housing helpline officers promoted the survey when they were helping tenants.

- A paper survey was sent to 2,771 (20%) of tenants, who were selected randomly.
34. Unfortunately, only 54 tenants responded to the survey. Feedback from officers suggested that tenants did not engage in the process as the majority that were spoken to had their rent paid through benefits.
35. The responses that were received are set out below:
- 75.9% of respondents thought that their rent was good value for money with 38.9% finding it very good value. Only 11.1% said that it was poor or very poor value for money.
  - 68% agreed that Council rents should be set in line with the full amount allowed by the Welsh Government, as long as this is affordable.
  - 79.2% tenants stated that they were not experiencing any difficulties in paying their rent, while 20.8% said that they were. 20.4% requested contact from officers to assist with payment of rent or any money issues they may have. These tenants will be contacted directly.
  - Further information about the consultation can be found at Appendix 1.

### **Proposed Rent Increase**

36. Given the current pressures on services, the need to maintain and improve our existing homes and to build new homes as outlined above, and taking into account the affordability and value for money of council rents and the help available for council tenants, it is proposed that rents should increase by 6.5%.
37. Further information about the support available to tenants and analysis on value for money and affordability is set out below:

### **Support available for Tenants**

38. There are a range of advice and support services to help tenants who are struggling to pay their rent or any other bills.
39. A new rent arrears pathway was introduced in 2021. This ensures that anyone experiencing rent arrears is able to access help and support easily via a gateway approach. Practical support as well as financial help via Discretionary Housing Payments or the Homeless Prevention Fund is provided. In 2021/22, 559 council tenants were assisted via the pathway.

In the first 6 months of this year, 391 council tenants have already been supported through this pathway.

40. The Welfare Liaison Team are a dedicated team supporting council tenants and work alongside the Money Advice team to provide one to one help with income maximisation and budgeting. They provide a holistic service and act impartially to work out affordable repayment plans for rent and other household bills. In 2021/22 benefits that were previously unclaimed by tenants were identified by the team totalling £2,635,525. In addition to this, one-off payments totalling £1,803,521 were identified for tenants in the form of grants and discounts. Support is available in some community Hubs, over the phone and also in tenants homes. The team are also able to refer into more specialist support from partner organisations including Citizens Advice and The Speakeasy Law Centre.
41. Where entering work or upskilling a tenant would help improve their financial position, the Council's Into Work team provide a wraparound employment support service for people of working age 16+. The service is accessed by a single point of entry via a gateway and people are triaged to the most appropriate support. This includes job clubs, one to one mentoring, training and funding to help remove barriers into employment.

#### **Additional Commitments to Support Tenants**

42. Cardiff has made an agreement with the Welsh Government to comply with a number of voluntary commitments to ensure that tenants, particularly those who pay all or part of their rent are protected. These commitments include:
  - There will be no evictions due to financial hardship for the term of the rent settlement in 2023-24, where tenants engage with officers.
  - The Council will continue to provide targeted support to those experiencing financial hardship to access support available.
  - A joint campaign, encouraging tenants to talk to their landlord if they are experiencing financial difficulties and access support available, will be launched across Wales.
  - Agreement to maximise the use of all suitable social housing stock, with a focus on helping those in the poorest quality transitional accommodation move into longer term homes that meet their needs
  - A commitment to invest in existing homes to keep them safe, warm and affordable to live in
  - building on existing engagement with tenants in rent-setting decisions, including explaining how income from rent is invested and spent.
  - Work in partnership with tenants, Welsh Government, funders and other partners to develop a consistent approach to assessing affordability across the social housing sector in Wales.
  - Cardiff Council will also participate in an all Wales assurance exercise in April 2023 to reflect on the application of the rent policy to date. This will build on the work undertaken by social

landlords over the past three years, and inform future work to develop a consistent approach to assessing affordability

### **Value for money**

43. All social landlords in Wales must consider affordability issues for tenants when proposing their rent increase to ensure rent and service charges represent value for money.
44. Even with the proposed rent increase Cardiff's rents are significantly lower than market rents.

### **Comparison with the Private Rented Sector**

45. The table below shows, that even when the proposed 6.5% rent increase is applied, Cardiff's rents remain very good value for money when compared to private rents. For example, the rent for a one bedroom council property would still be £60.32 a week on average (56%) less expensive than the average private sector rent for the same size accommodation. While a two bedroom council property would be £83.98 (68%) less than its private sector equivalent. As well as enjoying lower rents, council tenants also enjoy a wide range of services and support not available to private tenants as set out in the paragraphs above.

#### **Market rents compared to new proposed Council rents**

<b>No. of Bedrooms</b>	<b>Weekly Current Rent 22/23</b>	<b>Proposed Weekly Rent 2023/24 (6.5% increase)</b>	<b>Weekly Median Private Market Rents (Nov 22)</b>
1	£100.17	£106.68	£167.00
2	£115.51	£123.02	£207.00
3	£132.24	£140.84	£274.00
4	£146.57	£156.09	£331.00

*Council rents in the table above are based on 52 weeks collection and include service charges. Weekly Private Market rents are as at November 2022 and have been taken from the Hometrack website which provides online access to localised residential market analysis.*

### **Affordability**

46. The Joseph Roundtree Foundation (JRF) Living Rent Model has been used to review the proposed rents.

47. The model states that a Living Rent should be affordable for a household with someone in full-time employment and earning around the minimum wage. The model uses the earnings of the lower quartile (lowest 25%) of earners resident in Cardiff. The model assumes that 28% of income is available to pay rent. This figure is then adjusted for household size.
48. As can be seen from the table below Cardiff's rents are well below the JRF Living Rent, with a one bedroom flat being £24.45 below and a 3 bedroom house being £29.85 below. For larger properties the difference is even greater with a £58.67 difference for a 4 bed flat and £46.22 for a 4 bedroom house.

### **Comparison of Council Rents with Living Rents**

<b>Property Type</b>	<b>Proposed Cardiff Council Net Rent – per week 2023/24 (before service charges are added)</b>	<b>Proposed Living Rent – per week 2023/24 (before service charges are added)</b>	<b>Difference in charge per week (Total &amp; %)</b>
<b>Bedsit</b>	<b>£79.74</b>	<b>£104.19</b>	<b>£24.45</b>
			<b>30.66%</b>
<b>1 Bed Flat / Maisonette</b>	<b>£94.63</b>	<b>£104.19</b>	<b>£9.56</b>
			<b>10.10%</b>
<b>2 Bed Flat / Maisonette</b>	<b>£109.52</b>	<b>£135.44</b>	<b>£25.92</b>
			<b>23.66%</b>
<b>3 Bed Flat / Maisonette</b>	<b>£124.40</b>	<b>£166.70</b>	<b>£42.30</b>
			<b>34.00%</b>
<b>4 Bed Flat / Maisonette</b>	<b>£139.29</b>	<b>£197.96</b>	<b>£58.67</b>
			<b>42.12%</b>
<b>2 Bed House / Bungalow</b>	<b>£121.96</b>	<b>£135.44</b>	<b>£13.48</b>
			<b>11.05%</b>
<b>3 Bed House / Bungalow</b>	<b>£136.85</b>	<b>£166.70</b>	<b>£29.85</b>
			<b>21.81%</b>
<b>4 Bed House / Bungalow</b>	<b>£151.74</b>	<b>£197.96</b>	<b>£46.22</b>
			<b>30.46%</b>

49. The living rent for Cardiff has been calculated using the JRF formula and are calculated before service charges are applied. Further detail can be found in the Affordable Rents Report at Appendix 2.

## Energy Performance

50. The energy performance of Cardiff's council homes is better than the average for any tenure. This makes Cardiff council properties more affordable to heat.

Tenure	Average SAP Ratings
Owner Occupier	62.1
Private Rent	63.4
Social Rent	71.0
Cardiff Council	71.5
Cardiff Council New Build	85.0

As at 31<sup>st</sup> March 2022 – Source Office of National Statistics

## Service Charges

51. Social landlords are expected to set service charges which are reasonable and affordable. Landlords are required to review service charges annually, to ensure they provide value for money for tenants and are affordable. Landlords are required to list their service charges separately to the rent to allow for transparency to tenants.
52. Most service charges are eligible for housing benefit/universal credit, except where personal heating / water is provided.
53. In previous years, service charges have been based on the September CPI rate or on actual cost where this is known. Due to the very high level CPI at 10.1% in September it is proposed to uplift service charges by 6.5%, in line with the rent increase, or by actual costs where known. 6.5% is considered to be more reflective of the cost of the services for which the charge is made. The impact of this on the more commonly applied service charges can be seen in the table below.

Property Type	Average service charge 2022	Proposed Increase (6.5%)
Houses	£4.36	£4.64
Flats	£10.18	£10.84
Sheltered Bungalow	£16.92	£18.02
Community Living	£42.35	£45.10

54. It is proposed that service charges for personal heating and hot water, where provided, are based on actual costs (based on costs for October 2021 to September 2022). The personal heating charge within community living schemes would increase on average from £5.43 to £10.95 an increase of 101.60%. The maximum charge that would apply would be £13.07. Support will be provided to tenants to claim their entitlements under government schemes and any tenants suffering hardship will be



offered help through the Council's own financial support schemes available for those most in need.

55. A full list of service charge proposals can be found at Appendix 3. It should be noted that the costs of some specialist accommodation schemes are still being established and also costs for some contracted services for 2023/24 are not yet available. However all service charges will either be increased by 6.5% or by actual costs where known.

### **Equality Impact Assessment and Future Generations Act**

56. An Equalities Impact Assessment has been carried out and did not give rise to any concerns. This is attached at Appendix 4. The proposals are in line with the requirements of the Future Generations Act.

### **Scrutiny Consideration**

57. The Community & Adult Services Scrutiny Committee are due to consider this report. Any comments received will be circulated at the Cabinet meeting.

### **Reason for Recommendations:**

58. To set the rents for council homes taking into account the needs of tenants, affordability and value for money and the requirement to set a sustainable budget for the Housing Revenue Account for 2023/4.
59. To set service charges for council tenants for 2023/24.

### **Financial Implications**

60. The Council has a statutory duty to ensure that the Housing Revenue Account (HRA) achieves a balanced budget. Any liabilities of the HRA are ultimately liabilities of the Council and it is essential that the budget setting in any year has regard to robust viability and risk assessments, particularly in respect of the rent setting policy.
61. This report sets out the background to the proposed approach to the setting of rent and service charge levels for 2023/24. This is aligned to the need to give increased notice periods to tenants for annual rent uplifts as a new legislative requirement of the Renting Homes Wales Act 2016 which comes into force in December.
62. The report sets out the background to the current Social Housing Rent policy which runs through to 2024/25 and the ministerial decision to set the maximum rent uplift for 2023/24 at 6.5%.
63. While 6.5% is the maximum increase allowable for 2023/24, landlord decisions on rent must also consider the affordability of rents for tenants. The rent policy recognises the requirement to balance the needs of landlords with the interests of tenants and it includes a requirement that social landlords make an annual assessment of affordability and cost

efficiencies which demonstrate that their homes and services represent value for money. This assessment is set out in paragraphs 43 to 49 of the report. Prior to determining the recommendations in this report, members should be content with the outcomes of this assessment.

64. This report sets out the potential implications of a rent uplift based on various scenarios as highlighted in the table at page 4 of the report. A decision to set rents at the maximum 6.5% is considered based on current information to have the potential to result in a revenue budget shortfall in the region of £2.213 million. It should be noted that this table sets out very high-level indicative positions based on a number of assumptions and variables which are subject to change in the coming months and will need to be firmed up as more information becomes available. These include, but are not limited to, inflationary pressures across a wide range of goods and services, interest rate movements, future pay award settlements and other full year impacts of the costed establishment, progress of the new build programme and timings of availability to let.
65. The current volatility in costs and uncertainty as to how these variables are likely to develop make any predictions very difficult at present and these estimates are likely to change over the coming months. An up to date assessment of these variables will be included in the detailed budget that will be developed and presented to Cabinet for approval in February 2023.
66. Rent uplifts lower than assumed in previous budgets and business plans have the potential to impact on the level and quality of service provision to tenants and on the capital schemes that can be taken forward due to considerations of affordability, prudence and the sustainability of additional borrowing requirements. It will be necessary for the Directorate to review and prioritise revenue operating costs to identify the required savings and to support ongoing financial resilience. In addition, a review and reprioritisation of the Capital Programme will be required with a realignment where feasible of future spend plans to ensure that capital spend commitments entered into remain affordable in the short and longer term.
67. The report proposes a range of uplifts to service charges as set out at paragraphs 51 to 55 above and at Appendix 3. Whilst some charges are proposed to be increased in line with inflation, others are proposed to be uplifted by 6.5% in line with the proposed rent increase or at a level to fully recover costs. It will be essential to monitor any outcomes of these uplifts, not least the impact of the proposed increases to rent and service charges on tenants and their ability to pay in the current economic climate and cost of living crisis.
68. The HRA budget 2023/24 and MTFP will be developed in the coming weeks and will be presented for approval by Cabinet as part of the Council Budget setting process in February 2023. Decisions on the setting of rents and service charges for 2023/24 will be a key factor in determining the future resources available to the HRA and the requirement for efficiencies and reprioritisation of service delivery plans.

69. It should be noted that there are significant capital expenditure commitments for the HRA both incurred and proposed for the future with a resultant increased borrowing requirement in order to invest in homes and create new assets. The HRA Capital Programme will be reviewed in the coming weeks in line with the 30-year HRA Business plan. The latter will be reported to Cabinet for approval in March 2023.
70. The report at paragraphs 21 to 24 sets out the approach to identification of potential efficiencies in service delivery. These along with the impact of decisions with regard to the timing of planned spend within the capital programme and borrowing levels as a result will need to be considered in detail as part of the detailed budget and business plan work.
71. The report also highlights a number of pressures on the HRA as a result of increased demand for housing services and tenant support along with new build ambitions and other initiatives and strategies such as energy cost reduction measures, WHQS and the net zero carbon targets. There is a significant risk to the affordability of these strategies and continuation of service delivery which highlights the need to seek all sources of available additional funding to mitigate where possible any impact on the HRA.
72. There are a number of significant risks to financial resilience in the HRA which will need to be monitored and managed closely. This will be reported in further detail and set out within the proposed HRA Budget 2023/24 and the HRA Business Plan.
73. Any decisions to manage the position in the short term through the use of earmarked reserves and balances must be taken in the knowledge that such reserves are one off and will not meet any ongoing funding gap in the longer term.

### **Legal Implications**

74. Section 103 Of the Renting Homes (Wales) Act 2016 provides for the landlord to vary the rent of a secure contract by giving the contract holder a notice setting out when the new rent will take effect on the date specified in the notice. The period may not be less than two months.
75. All decisions taken by or on behalf of the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.
76. The Council has to satisfy its public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of

opportunity and (3) foster good relations on the basis of protected characteristics.

77. As such a decision to implement the proposal has to be made in the context of the Council's equality act public sector duties.
78. The report identifies that an Equality Impact Assessment has been carried out. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty. The decision maker must have due regard to the Equality Impact Assessment in making its decision.

### **HR Implications**

79. There are no HR implications for this report.

### **Property Implications**

80. The body of the report sets out the Council house rent methodology and process, as supported by Welsh Government policy. Any rent calculations should be undertaken in accordance with relevant professional advice and implemented in adherence to the Council's property management and legal processes.

## **RECOMMENDATIONS**

Cabinet is recommended to approve the proposed approach for rent and service charge setting for Council owned dwellings for financial year 2023/2024.

<b>SENIOR RESPONSIBLE OFFICER</b>	Jane Thomas, Director Adults Housing and Communities
	9 December 2022

*The following appendices are attached:*

- Appendix 1 -Tenant Consultation Report
- Appendix 2 - Affordable Rents Report
- Appendix 3 - Proposed Service Charges 2024/5
- Appendix 3 - Equality Impact Assessment

# Appendix 1



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FAIRER  
GREENER**



# Your Rent, Your Say 2023

November 2022

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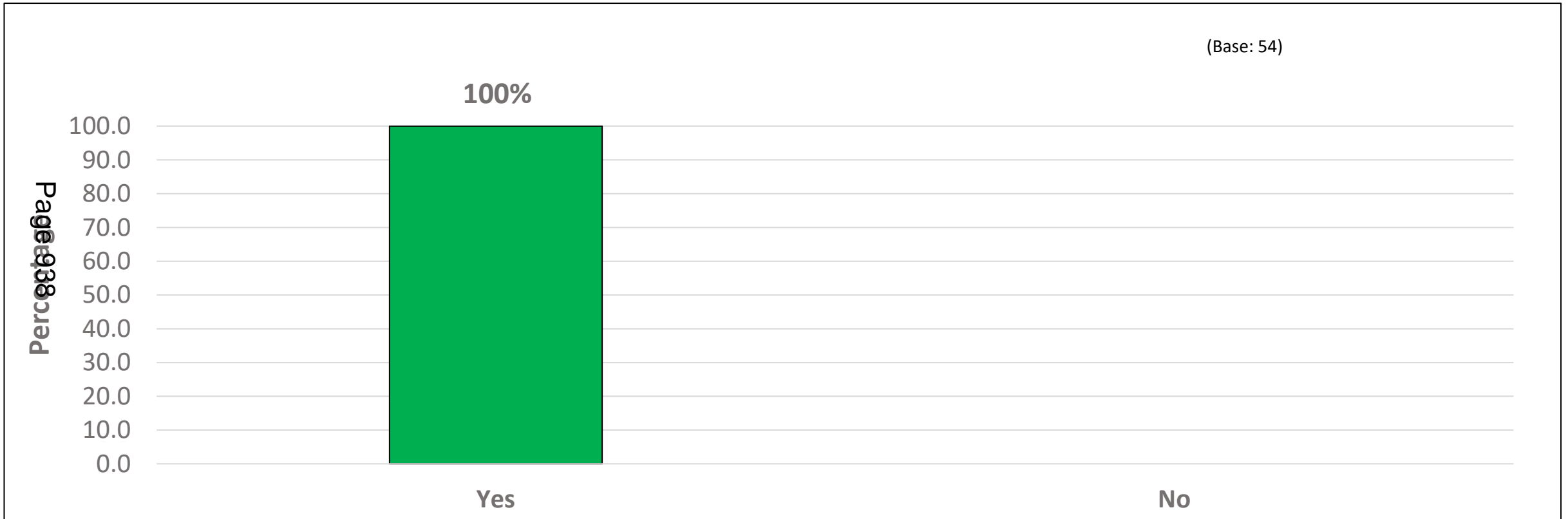
#GweithioDrosGaerdydd  
#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

# This survey is solely for Cardiff Council Tenants - are you a Cardiff Council tenant?



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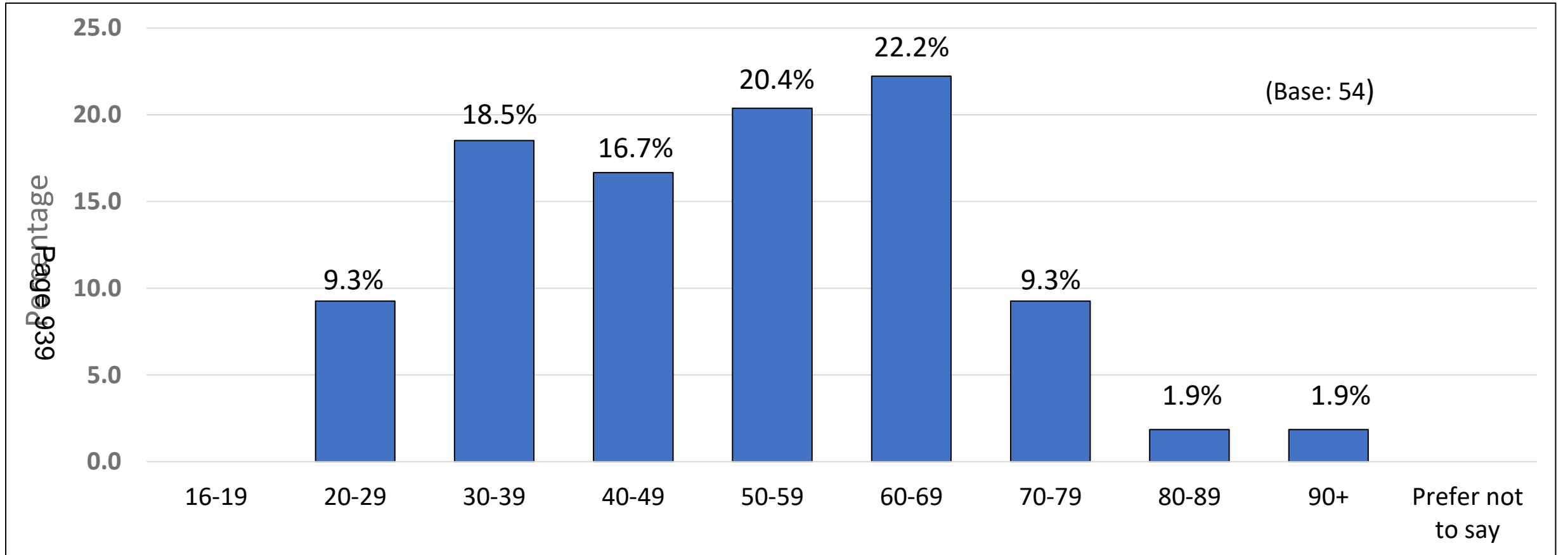
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#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

# Age Bands of Respondents



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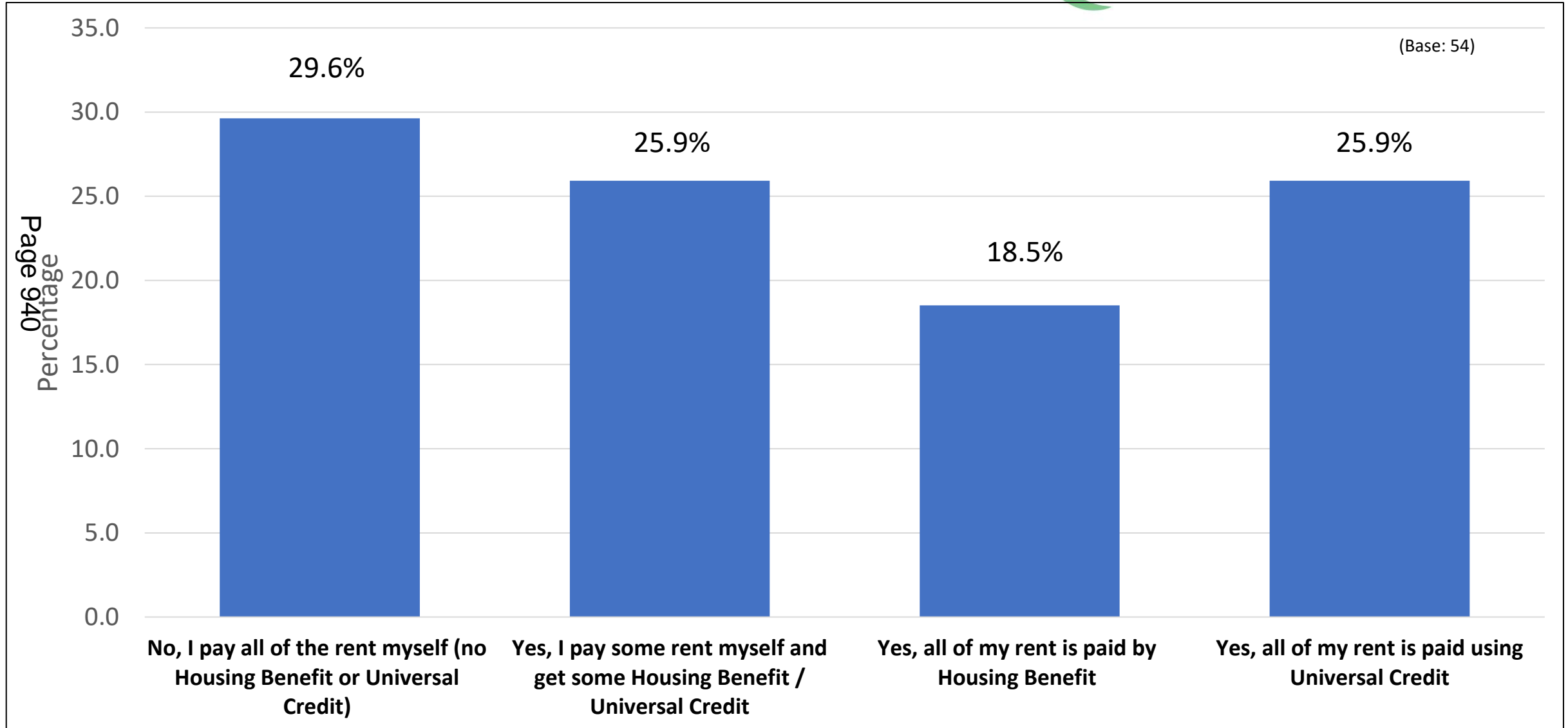
#GweithioDrosGaerdydd  
#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

# Do you receive Housing Benefit or Universal Credit to help pay your rent?



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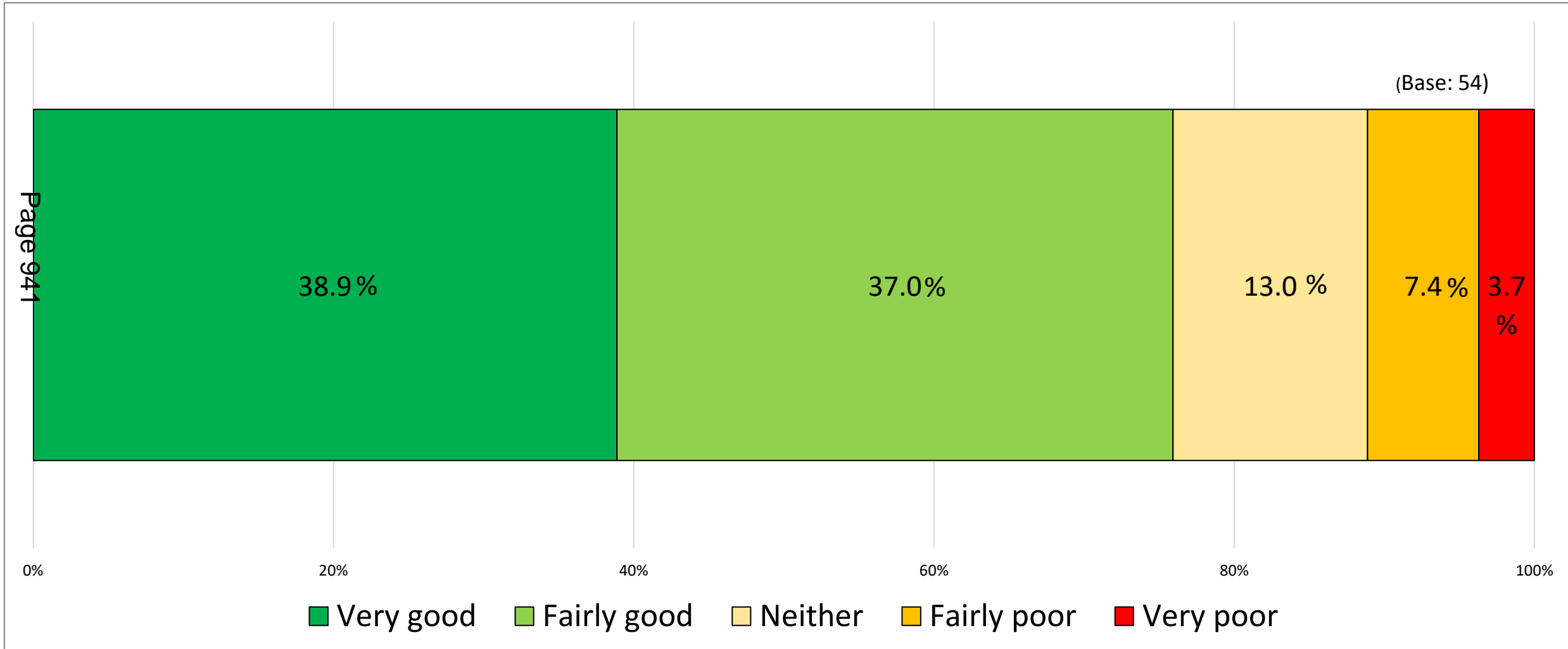




**Taking into account the accommodation and the services we provide, do you think that the proposed rent for your property represents good value for money?**



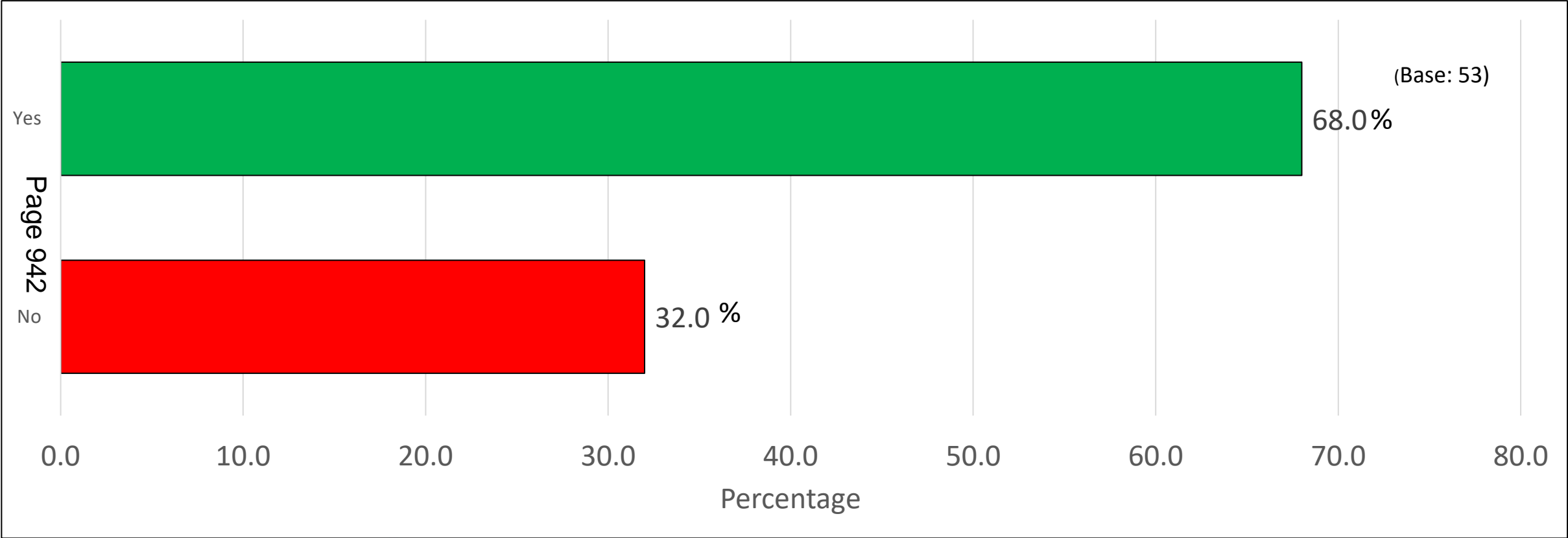
**STRONGER  
FAIRER  
GREENER**



# Do you agree with the proposal to set rents in line with the full amount allowed by the Welsh Government, as long as this is affordable?



**STRONGER  
FAIRER  
GREENER**



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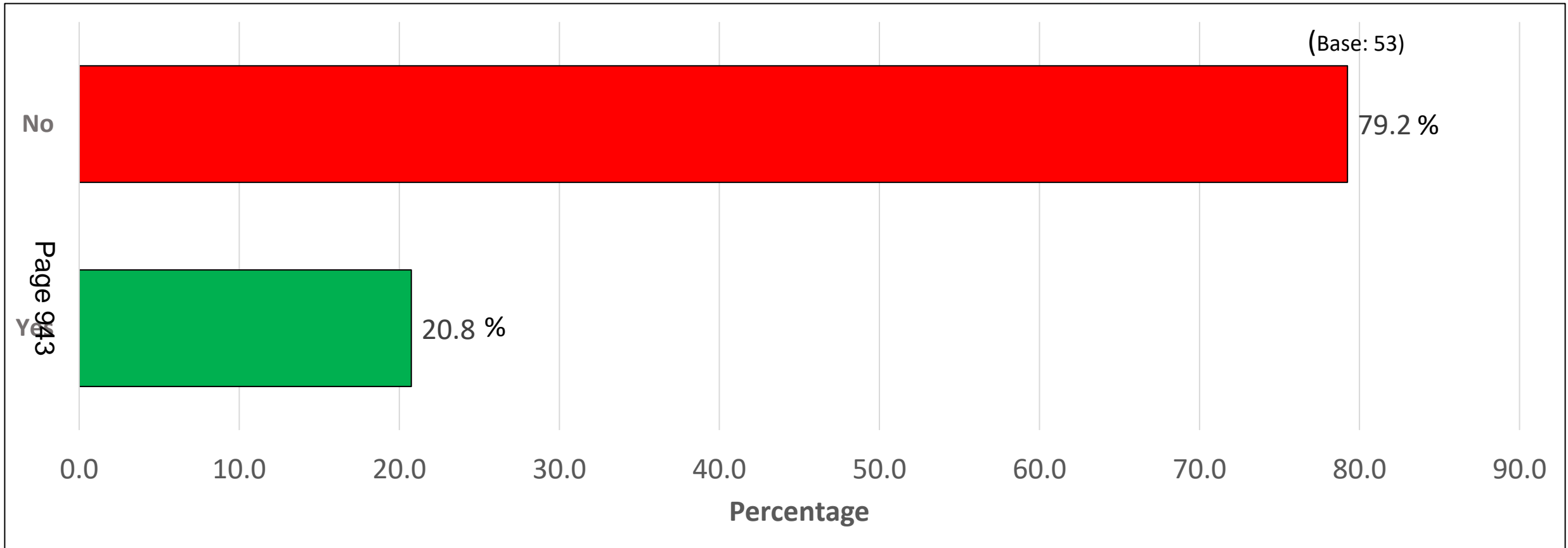
#GweithioDrosGaerdydd  
#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

# Are you currently experiencing any difficulties in paying your rent?



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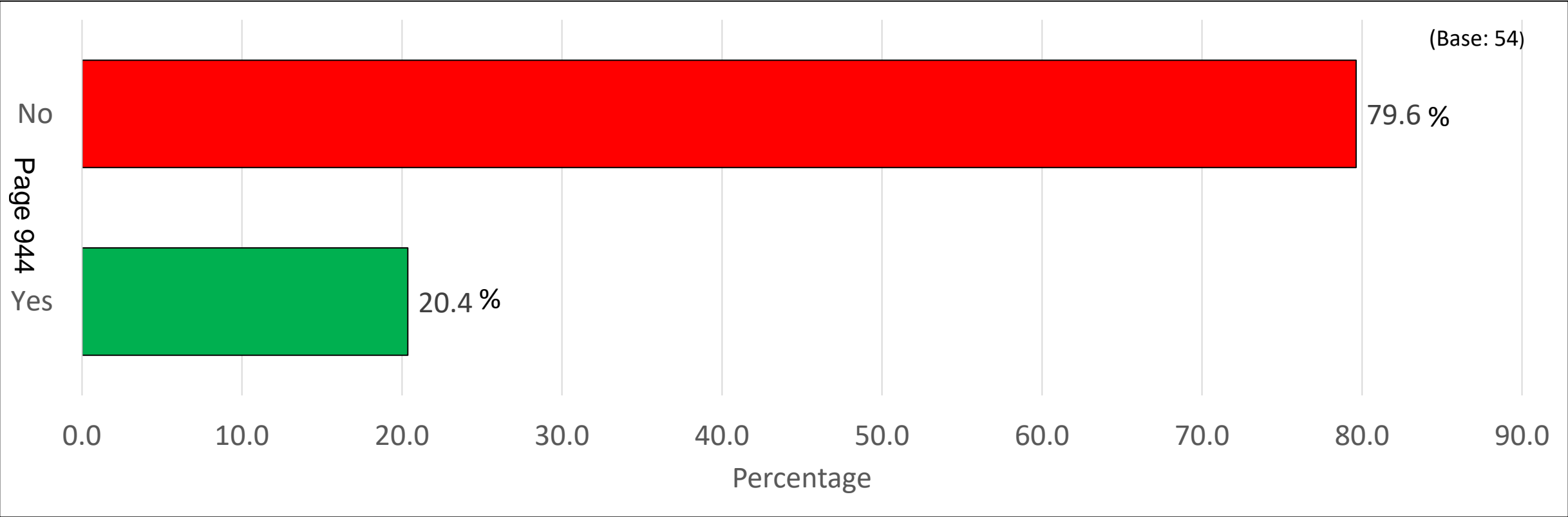
#GweithioDrosGaerdydd  
#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

# Would you like us to contact you so we can discuss how we might be able to help you to pay your rent and with any other money issues you may have?



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FAIRER  
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#GweithioDrosGaerdydd  
#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

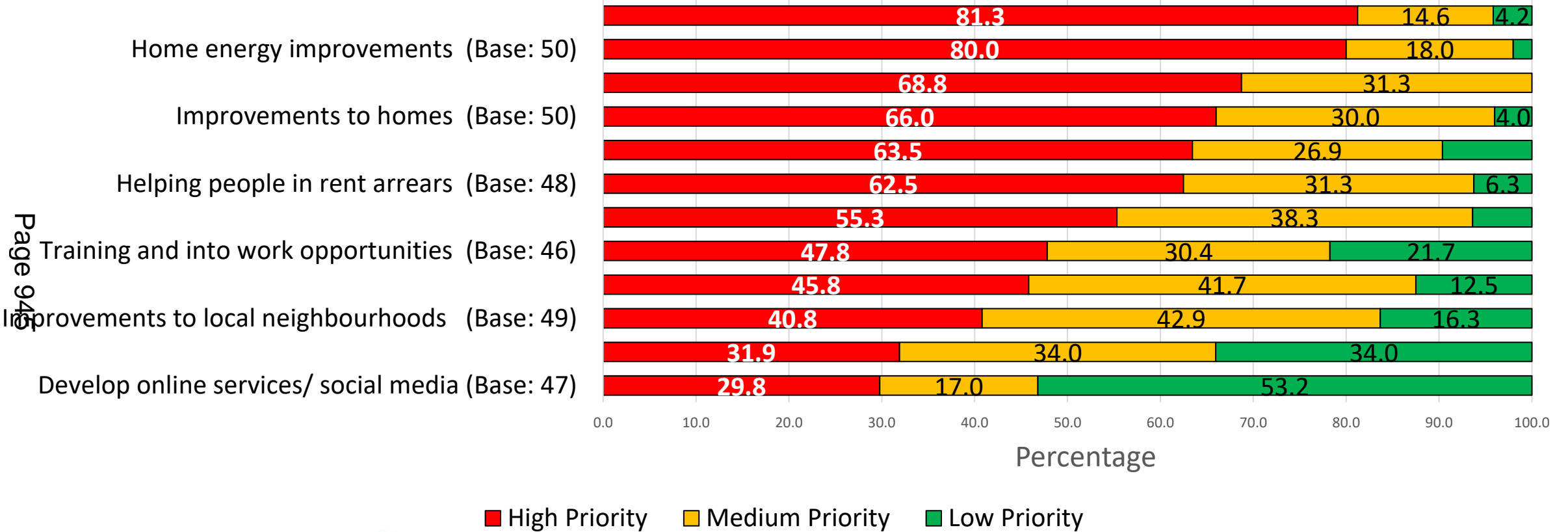
# What do you think our priorities should be over the next 5 years?



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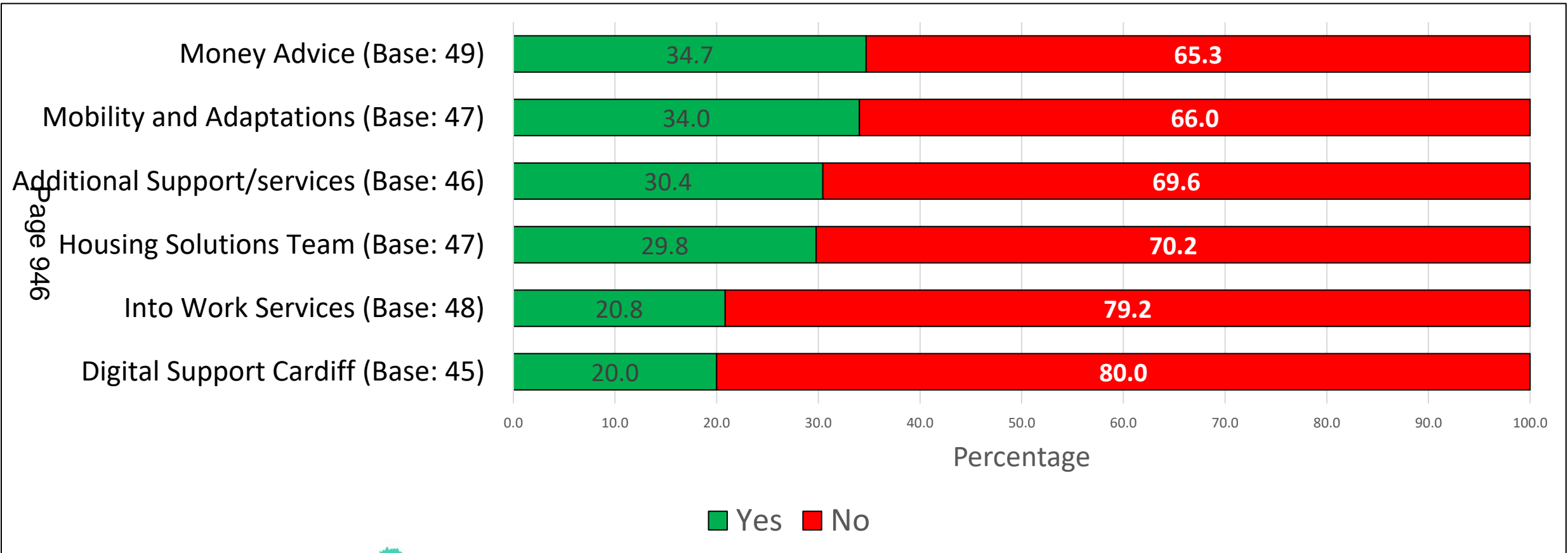
#GweithioDrosGaerdydd  
#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

# Other Services - Would you like to receive information on the following help and support services?



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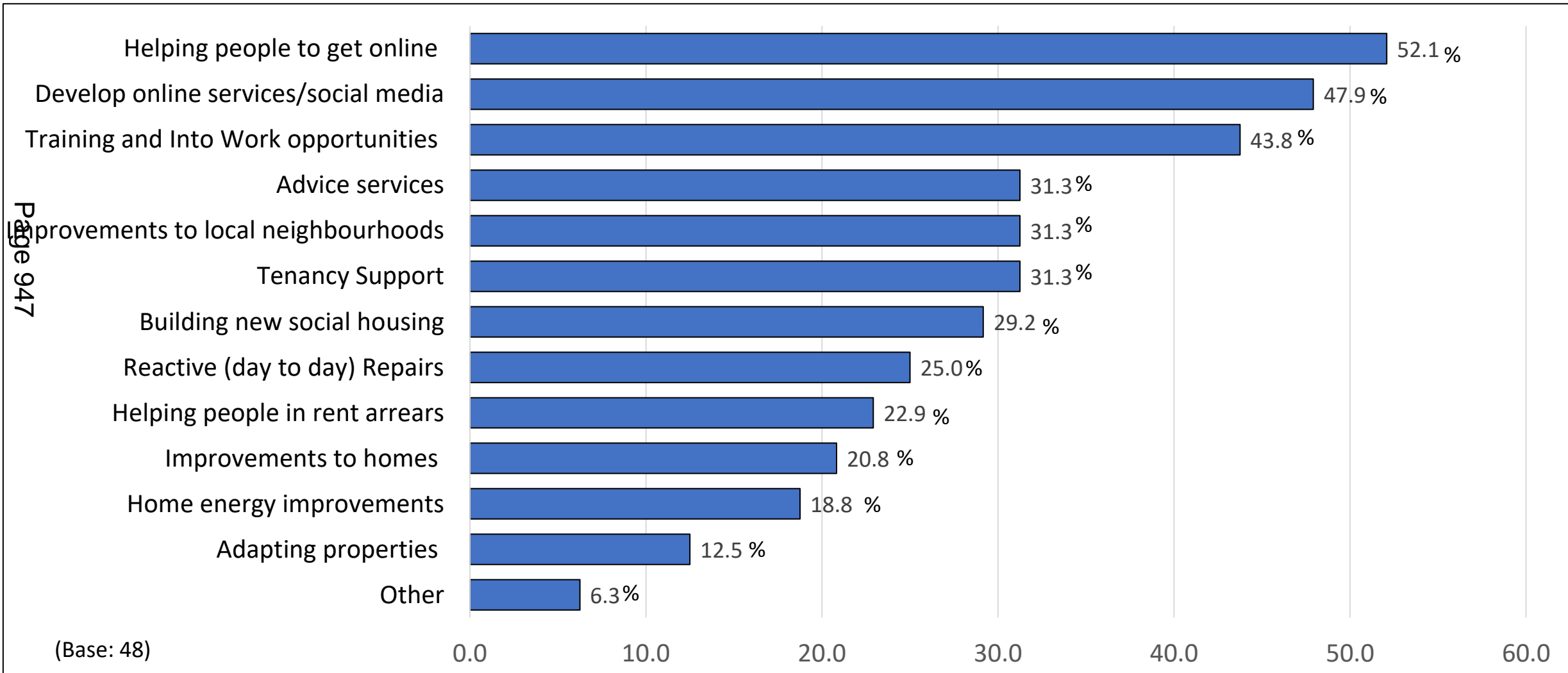
#GweithioDrosGaerdydd  
#GweithioDrosochChi

#WorkingForCardiff  
#WorkingForYou

# If following the Welsh Government decision, the forecasted rent income is below the level needed to maintain our current level of service, which areas do you think should be scaled back?



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## Appendix 2

### Affordability of Rents in Cardiff

#### Rent levels and value for money

Whilst the responsibility for setting rents rests with the Council, this is specified within boundaries laid out in the Welsh Government rent policy framework.

When determining the setting of rents and service charges, social landlords must make an assessment of cost efficiencies, value for money and affordability for tenants.

The maximum overall rent increase allowable in any one year is the September Consumer Price Index (CPI) +1%. Should CPI fall outside the range of 0% to 3%, the responsibility rests with the Climate Change Minister to determine the appropriate change to rent levels for the year.

In September 2022, CPI was 10.1%, well above the range allowable by the policy. Therefore, a decision regarding the rent setting was required by the Minister. On 16<sup>th</sup> November 2022 the Minister announced that the social rent cap had been set at 6.5%.

It is therefore proposed to increase the rent for Cardiff Council homes by 6.5% from April 2023.

Cardiff Council must provide housing that remains affordable for current and future tenants and is assessed for cost efficiency and value for money.

Rents charged by private landlords are significantly higher than Council rents. The table below shows the current weekly rent and the proposed average rent for 2023/24 compared with the current Local Housing Allowance (LHA) rates and with rents in the private rented sector.

#### Weekly rent levels and corresponding LHA rates

No. of Bedrooms	Weekly Current Rent 22/23	Proposed Weekly Rent 2023/24 (6.5% increase)	Weekly Local Housing Allowance (22/23)	Weekly Private Market Rents - Nov 2022
1	£100.17	£106.68	£120.82	£167.00
2	£115.51	£123.02	£149.59	£207.00
3	£132.24	£140.84	£178.36	£274.00
4	£146.57	£156.09	£218.63	£331.00

NB: Estimated rents above are based on 52 weeks collection and include estimated current service charges to make them directly comparable with LHA rates.

### **The Joseph Rowntree Foundation (JRF) Living Rent Model**

The JRF Living Rent model links rents directly to an index of earnings and uses a recognised equivalence scale to allow for household income and property size to produce a Living Rent.

The model states that a Living Rent should be affordable for a **household with someone in full-time employment, working the average number of hours worked per week (including overtime) and earning around the minimum wage**. This uses the lower quartile national earning figures.

However, this income needs to be adapted to reflect the differing composition of households in different-sized properties and the fact that household income for low-paid families with children is likely to be enhanced by benefits and tax credits.

The Living Rents are based on:

- Lower quartile localised earnings data from the Office for National Statistics' Annual Survey of Hours and Earnings (**ASHE**). The gross weekly figure below which **25% of the lowest earners resident in Cardiff** earn in 2022 is **£372.10**.
- These earnings are then adjusted for property size, in accordance with the JRF model.
- The starting rent is then set at 28% of the adjusted earnings.

The full calculations including details of the equivalence rates are set out in Appendix One.

The calculated living rents are set out below:

<b>Property Type</b>	<b>Weekly Living Rent</b>
Bedsit	£104.19
One Bedroom	£104.19
Two Bedrooms	£135.44
Three Bedrooms	£166.70
Four Bedrooms	£197.96

### **Proposed rent levels**

The following table shows how the rents calculated using the Living Rent model compare with the proposed net rent for Cardiff Council properties from April 2023.

It indicates that overall Cardiff rents fall within an affordable level.

**Breakdown of weekly rent before service charges**

<b>Property Type</b>	<b><i>Proposed Cardiff Council Net Rent – per week 2023/24</i></b> <b>(before service charges are added)</b>	<b><i>Proposed Living Rent – per week 2023/24</i></b> <b>(before service charges are added)</b>	<b>Difference in charge per week (Total &amp; %)</b>
<b>Bedsit</b>	<b>£79.74</b>	<b>£104.19</b>	<b>£24.45</b>
			<b>30.66%</b>
<b>1 Bed Flat / Maisonette</b>	<b>£94.63</b>	<b>£104.19</b>	<b>£9.56</b>
			<b>10.10%</b>
<b>2 Bed Flat / Maisonette</b>	<b>£109.52</b>	<b>£135.44</b>	<b>£25.92</b>
			<b>23.66%</b>
<b>3 Bed Flat / Maisonette</b>	<b>£124.40</b>	<b>£166.70</b>	<b>£42.30</b>
			<b>34.00%</b>
<b>4 Bed Flat / Maisonette</b>	<b>£139.29</b>	<b>£197.96</b>	<b>£58.67</b>
			<b>42.12%</b>
<b>2 Bed House / Bungalow</b>	<b>£121.96</b>	<b>£135.44</b>	<b>£13.48</b>
			<b>11.05%</b>
<b>3 Bed House / Bungalow</b>	<b>£136.85</b>	<b>£166.70</b>	<b>£29.85</b>
			<b>21.81%</b>
<b>4 Bed House / Bungalow</b>	<b>£151.74</b>	<b>£197.96</b>	<b>£46.22</b>
			<b>30.46%</b>

NB: rents above are for 52 weeks and *do not* include service charges to make them comparable with the living rent formula.

## **Appendix 1: Calculating the Living Rent**

In order to provide an initial estimate of how Cardiff Council's rent levels compare to the JRF Living Rent model the following two-part formula has been used:

- 1) New weekly wage x Equivalence Rating = Weekly equivalent income
- 2) Weekly equivalent income x 28% = Weekly Living Rent

ASHE has been used to obtain the **weekly** earnings figure, below which the **25% lowest earners resident in Cardiff** fall. The gross figure for 2022 is **£372.10**.

The model proposed by the JRF states that the weekly earnings figure must be adapted to reflect the differing composition of households in different-sized properties and the fact that household income for low-paid families with children is likely to be enhanced by benefits and tax credits. This is called the equivalence rating. The equivalence model used by JRF is the OECD modified scale. The equivalence scale will vary for each household member as seen in figure 2.

### **Type of Household Member Equivalence value**

<b>Household Member</b>	<b>Equivalence Value</b>
First Adult	1
Additional Adult	0.5
Child aged 14 and over	0.5
Child aged 0-13	0.3

To account for the difference in equivalence value for children depending on their age a figure of 0.3 has been used for each additional child as the JRF model only provides equivalence values for one, two and three bed properties.

<b>Bedroom Size</b>	<b>Household Size</b>	<b>Equivalence Rating</b>
<b>Bedsit</b>	Single Adult	<b>1.0</b>
<b>One bedroom</b>	Single Adult	<b>1.0</b>
<b>Two bedroom</b>	One working adult and one child	<b>1.3</b>
<b>Three bedroom</b>	One working adult and two children	<b>1.6</b>
<b>Four Bedroom</b>	One working adult and three children	<b>1.9</b>

## Equivalence Table

Using a two bed property as an example the calculation is set out as follows:

### Two Bedroom

$$\text{£}372.10 \times 1.3 = \text{£}483.72$$

Gross weekly wage	Equivalence rating	Equivalent weekly income
-------------------	--------------------	--------------------------

$$\text{£}483.72 \times 28\% = \text{£}135.44$$

Equivalent weekly income	Weekly living rent
--------------------------	--------------------

The JFR calculation of living rents does not cover specialist or supported accommodation rent levels. The model also uses net rent levels, i.e. does not include service charges.

It should be noted that the Welsh Government intend to review the affordability models used in Wales in the future with the aim of standardising this.

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## Appendix 3

### Proposed Service Charges

#### Property Service Charges

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Communal Maintenance	£3.60	£3.83	6.5%	
Garages attached to property	£6.72 - £9.18	£7.16 - 9.78	6.5%	
Hardstand	£2.47	£2.63	6.5%	
Carport	£4.66	£4.96	6.5%	

#### Flat Service Charges

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Cleaning Service (Rota)	£4.87	£5.19	6.5%	
Cleaning Service High Rise	£5.47	£5.83	6.5%	
Cleaning Service own entrance	£1.23	£1.31	6.5%	
Cleaning Service – Reduced Service	£2.71	£2.89	6.5%	
Concierge Service	£1.12	£1.19	6.5%	
Flat Communal Services – Maintenance, Door entry system, landlord lighting	£2.92	£3.11	6.5%	
John Kane Court – Cleaning, maintenance, and ground maintenance	£14.22	£15.15	6.5%	
John Kane Court own utilities – heating & water	£8.65	£9.21	6.47%	Based on cost for previous billing period

## Community Living (Sheltered) Schemes

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Scheme management, maintenance, cleaning, fire & safety checks, and telecare	£29.78	£31.52	6.5%	
Communal Heating and Lighting *	£6.05	£8.71	43.90%	Based on costs Oct 2021 – Sep 2022
Own Heating*	£5.43	£10.95	101.60%	Based on costs Oct 2021 – Sep 2022
Own Water*	£4.18	£4.32	3.35%	Based on cost for previous billing period

\*Average Cost

## Specialist Accommodation (including hostels and supported housing)

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Housing related support services	£64.42 - £279.60			Based on costs of each service provider
Communal utilities*	£3.40	£4.89	43.90%	
Own Electricity*	£7.01	£14.13	101.60%	
Scheme service charges – for example, security, management, and central support costs. Routine and specialist cleaning*	£182.51	£194.37	6.5%	
Own use water*	£4.54	£4.69	3.35%	
Own use Laundry*	£2.27	£2.42	6.5%	
Optional food provision	£14.00	£14.91	6.5%	
Private Leasing Scheme				As per Local Housing Allowance
Television Replacement & Licence	£0.97	£0.97	0	

\*Average Cost



## Miscellaneous

<b>Service</b>	<b>Current Service Charge</b>	<b>Proposed Service Charge</b>	<b>Proposed Increase Percentage</b>	<b>Notes</b>
Optional Garage	£6.80	£7.24	6.5%	
Optional garage, water on site	£7.08	£7.54	6.5%	
Optional garage at community living scheme (electricity)	£9.59	£10.21	6.5%	
Contracted out Services. For example, grounds maintenance at new build sites, Tai Penylan waste treatment plant.				As per contracted charge

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Equality Impact Assessment  
Corporate Assessment Template



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

<b>Policy/Strategy/Project/Procedure/Service/Function Title:</b>
<b>Rent Setting Proposals 2023/24</b>
<b>New</b>

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Helen Evans	Job Title: Assistant Director Housing & Communities
Service Team: Housing & Communities	Service Area:
Assessment Date: November 2022	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

The Council Housing Rent & Service Charge Setting 2023/24 report sets out the proposed approach for rent and service charge setting on Council owned dwellings from April 2023.

The report will also brief Cabinet on how efficiencies will be made to address the budget deficit in the Housing Revenue Account and details the help and support available to tenants who are struggling with the cost-of-living crisis.

**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

#### Equality Impact Assessment Corporate Assessment Template

The Housing Revenue Account (HRA) records income and expenditure arising from the provision of Cardiff Council's 13,852 housing stock. The HRA is ringfenced for transactions related to the council's housing landlord functions and cannot be used for other purposes.

The main source of income is from tenants in the form of rents and service charges. The purpose of reviewing rents is to ensure the Housing Revenue Account has enough income to provide quality housing services for current and future tenants. Rental income allows the service to invest in the maintenance and improvement of existing homes and neighbourhoods, provide good tenant support services, partially fund our community Hubs and also build new homes.

In January 2022, the Welsh Government announced the introduction of Renting Homes (Wales) Act 2016. This will come into force on 1<sup>st</sup> December 2022. This new legislation will apply to Council, Housing Association, supported housing and privately rented properties in Wales. The Act has implications on how properties are let and managed. This new legislation requires landlords to give tenants two months' notice of their rent change. Previously only 28 days notice was required.

The reviewing and setting of rent and service charges is normally decided by Cabinet during budget setting in February of each year. To meet the new notice period requirements as laid out in the Act, rent and service charge setting will need to be decided ahead of the normal budget process annually going forward.

#### **Rent Setting Policy**

Whilst the responsibility for setting rents rests with the Council, this is specified within boundaries laid out in the Welsh Government rent policy framework These rules are:

When determining the setting of rents and service charges, social landlords must make an assessment of cost efficiencies, value for money and affordability for tenants which should be discussed at Cabinet or Council.

The maximum overall rent increase allowable in any one year is the September Consumer Price Index (CPI) +1%. Should CPI fall outside the range of 0% to 3%, the responsibility will rest with the Housing Minister to determine the appropriate change to rent levels for the year.

In September 2022, CPI was 10.1%, well above the range allowable by the policy. Therefore, a decision regarding the rent setting was required by the Minister who announced on the 16<sup>th</sup> November 2022 that the maximum that rents can increase by is 6.5%. The Minister confirmed that this was a maximum increase and set and decision making is with the Council.

Equality Impact Assessment  
Corporate Assessment Template

**3 Assess Impact on the Protected Characteristics**

**3.1 Age**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years		x	
18 - 65 years		x	
Over 65 years		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted by the Council Housing Rent & Service Charge Setting 2023/24 report.

**What action(s) can you take to address the differential impact?**

**3.2 Disability**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

## Appendix 4

### CARDIFF COUNCIL

#### Equality Impact Assessment Corporate Assessment Template

	Yes	No	N/A
Hearing Impairment		x	
Physical Impairment		x	
Visual Impairment		x	
Learning Disability		x	
Long-Standing Illness or Health Condition		x	
Mental Health		x	
Substance Misuse		x	
Other		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all Cardiff Council tenants continue to be supported.

### 3.3 Gender Reassignment

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all Cardiff Council tenants continue to be supported.

**What action(s) can you take to address the differential impact?**

4.C.400	Issue 1	Aug 22	Process Owner: Dylan Owen	Authorised: Dylan Owen	Page 4
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Equality Impact Assessment  
Corporate Assessment Template

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**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage		x	
Civil Partnership		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all Cardiff Council tenants continue to be supported.

**What action(s) can you take to address the differential impact?**

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**3.5 Pregnancy and Maternity**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy		x	
Maternity		x	

Equality Impact Assessment  
Corporate Assessment Template

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all tenants continue to be supported.
<b>What action(s) can you take to address the differential impact?</b>

**3.6 Race**

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		x	
Mixed / Multiple Ethnic Groups		x	
Asian / Asian British		x	
Black / African / Caribbean / Black British		x	
Other Ethnic Groups		x	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all tenants continue to be supported.
<b>What action(s) can you take to address the differential impact?</b>



Equality Impact Assessment  
Corporate Assessment Template

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**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		x	
Christian		x	
Hindu		x	
Humanist		x	
Jewish		x	
Muslim		x	
Sikh		x	
Other		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all tenants continue to be supported.

**What action(s) can you take to address the differential impact?**

--

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A

## Appendix 4

### CARDIFF COUNCIL

#### Equality Impact Assessment Corporate Assessment Template

Men		x	
Women		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all tenants continue to be supported.

**What action(s) can you take to address the differential impact?**

### 3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		x	
Gay Men		x	
Gay Women/Lesbians		x	
Heterosexual/Straight		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted and that all tenants continue to be supported.

**What action(s) can you take to address the differential impact?**

Equality Impact Assessment  
Corporate Assessment Template

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**3.10 Socio-economic Duty**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

	Yes	No	N/A
		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

All social landlords in Wales must consider affordability issues for tenants when proposing their rent increase to ensure rent and service charges represent value for money.

When comparing the Councils new proposed rent charge it is still significantly lower than weekly private market rents.

The proposed rent increase has also been compared using a Living Rent model. The model indicates that overall Cardiff rents fall within an affordable level.

For those tenants who pay all or some of their rental costs there is a range of support available for those experiencing difficulties in paying their rent and the service works hard to reduce or remove the threat of eviction. The minister also set out a number of commitments to be made by social landlords to prevent evictions and support tenants. These are:

- a. There will be no evictions due to financial hardship for the term of the rent settlement in 2023-24, where tenants engage with their landlords.
- b. The Council will continue to provide targeted support to those experiencing financial hardship to access support available.
- c. a joint campaign, encouraging tenants to talk to their landlord if they are experiencing financial difficulties and access support available, will be launched across Wales.
- d. agreeing to maximise the use of all suitable social housing stock, with a focus on helping those in the poorest quality transitional accommodation move into longer term homes that meet their needs
- e. a commitment to invest in existing homes to keep them safe, warm and affordable to live in
- f. building on existing engagement with tenants in rent-setting decisions, including explaining how income from rent is invested and spent.

**Equality Impact Assessment  
Corporate Assessment Template**

- g. Working in partnership with tenants, Welsh Government, funders and other partners will develop a consistent approach to assessing affordability across the social housing sector in Wales.
- h. Cardiff Council will also participate in an assurance exercise in April 2023 to reflect on application of the rent policy to date. This will build on the work undertaken by social landlords over the past three years, and inform future work to develop a consistent approach to assessing affordability

No negative impact is therefore anticipated, however careful monitoring of services will take place to ensure that service users and tenants are fully supported.

**What action(s) can you take to address the differential impact?**

**3.11 Welsh Language**

Will this Policy/ Strategy/Project/Procedure/Service/Function have a **differential impact (positive/negative)** on the Welsh Language?

	Yes	No	N/A
		X	

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

All Welsh language policies will be followed. All tenants can express a language preference upon their first contact with services. This is then recorded on tenancy records to ensure their language preference is met.

**Equality Impact Assessment  
Corporate Assessment Template**

<b>What action(s) can you take to address the differential impact?</b>

**4. Consultation and Engagement**

What arrangements have been made to consult/engage with the various Equalities Groups?

<p>A consultation with tenants took place between 20<sup>th</sup> October 2022 and 16<sup>th</sup> November 2022.</p> <p>The Consultation comprised of:</p> <ul style="list-style-type: none"> <li>• Online rent survey</li> <li>• Paper survey sent to 20% of tenants, selected randomly.</li> <li>• Face to face Support provided to tenants by Hub staff</li> </ul> <p>The outcome of the survey has informed the Council’s decision on rent and service change setting.</p>
---

**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	N/A

## Appendix 4

### CARDIFF COUNCIL

#### Equality Impact Assessment Corporate Assessment Template

Disability	N/A
Gender Reassignment	N/A
Marriage & Civil Partnership	N/A
Pregnancy & Maternity	N/A
Race	N/A
Religion/Belief	N/A
Sex	N/A
Sexual Orientation	N/A
Socio-economic Duty	N/A
Welsh Language	N/A
Generic Over-Arching [applicable to all the above groups]	N/A

#### 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By :Jessica Tomlinson	Date:16/11/22
Designation:	
Approved By:	
Designation:	
Service Area:	

7.1 On completion of this Assessment, please ensure that the form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk).

For further information or assistance, please contact the Equality Team- [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)

**CABINET MEETING: 15 DECEMBER 2022**

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**CARDIFF BAY REGENERATION**

**INVESTMENT & DEVELOPMENT (COUNCILLOR RUSSELL  
GOODWAY)**

**AGENDA ITEM: 9**

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***Appendices 2, 3, 4 6,7, 8 and 9 of this report are not for publication as they contain exempt information of the description contained in paragraphs 14, 16 and 21 of Schedule 12A of the Local Government Act 1972.***

**Reason for this Report**

1. To provide an update on the Council's priority to establish Cardiff Bay as a leading UK urban visitor destination.
2. To seek authority for the disposal of land to attract two new attractions in Cardiff Bay.

**Background**

3. The political administration's strategic policy document *Capital Ambition* sets out the Council's priority to 'write a new chapter in Cardiff Bay's regeneration story'. The ambition for Cardiff Bay is to become established as a leading UK destination for leisure, culture and tourism to increase the number of visitors to the city and to generate more jobs for local people, particularly people living in the 'southern arc'.
4. Over recent years, the Council has made significant progress towards this priority. A number of important projects are now well underway with others progressing through the feasibility stages. In March 2022, a report was presented to Cabinet to provide an update on the Council's key regeneration projects in Cardiff Bay including the Atlantic Wharf development anchored by the new Indoor Arena and the redevelopment of the Red Dragon Centre and proposals for the completion of the International Sports Village development. The report also updated on a number of smaller leisure-based opportunities aimed at attracting more visitors to Cardiff Bay.
5. The Council's strategy for Cardiff Bay was presented to the investment market at MIPIM 2021, following the Cabinet report in March 2021. This led to several enquiries from potential investors and dialogue has continued with two parties seeking to bring forward high quality leisure-based attractions in Cardiff Bay.

## Issues

6. Although Cardiff Bay has largely been transformed from a post-industrial derelict state, several small pockets of land have remained undeveloped for decades. The Council has intervened to enable numerous sites to be brought forward for development including the Cardiff Bay Station building, the former Custom House and Cory's buildings and the derelict site on James Street adjacent to Mount Stuart School. The nature of the Council's intervention has included the provision of repayable loan finance, the assembly of land to remove barriers to development, the marketing of opportunities to attract investors, and the disposal of land at peppercorn to enable projects that require significant up-front capital investment.
7. The Graving Docks area has been left derelict and under-utilised for over 30 years. The surrounding area has benefitted from significant investment including Mermaid Quay, Techniquest and St David's Hotel, however the docks, which are listed and require significant investment to bring them back into a good state of repair, have remained untouched.

### Graving Docks - Nordic Urban

8. The Council has been approached by a Finnish company, Nordic Urban, who would like to invest in the Graving Docks area to deliver a Sea Pool and Finnish Sauna attraction similar to their investments in Helsinki and New York. The plan attached at Appendix 1 illustrates the land area required for the investment.
9. The Graving Docks comprise of three structures constructed between 1850 and 1900. The dock walls and various structures and relics have been listed and the area is currently managed by the Cardiff Harbour Authority.
10. Nordic Urban's concept and vision for the area is outlined in Confidential Appendix 2. It proposes the use of two of the graving docks for the Sea Pool and Sauna attraction. The third dock closest to the Havannah Street residential development is not included in the project and will continue to be used to provide moorings.
11. The proposal is for the docks to accommodate a number of floating outdoor swimming pools, some heated, some not, and associated decking. The attraction will also have a building to be situated in the space between the two docks accommodating saunas and wellbeing spaces alongside changing facilities, a restaurant and a bar.
12. The Council is not being asked for a financial contribution towards the cost of delivering the project. However, given the scale of upfront capital investment required, and the attention required to the listed structures, Nordic Urban require the land to be provided at a nominal rent by the Council. The proposed Heads of Terms are set out at Confidential Appendix 3. The lease will be restricted to leisure use.
13. The Council has prepared reports relating to the condition of the dock walls and the general constraints of the site including site service access, managing



the water quality and other practical considerations with regard to the operation of the site (see Confidential Appendix 4).

### **Skyview (Atlantic Wharf)**

14. The Council has been approached by SkyView Towers Ltd who would like to deliver a 90m high viewing platform in Cardiff Bay similar to other attractions in Europe but this will be the first of its kind in the UK. The attraction represents an alternative to a 'big wheel' providing panoramic views of the city and its waterfront to residents and visitors.
15. Following the launch of the Atlantic Wharf masterplan, Skyview Towers identified Cardiff as a primary opportunity to locate their first UK based rotating viewing platform attraction.
16. A number of locations have been considered within the Cardiff Bay area. Most would have required the tower to be relocated once the masterplan for the Atlantic Wharf area matures, at the Council's cost. This has led the Council and Skyview Towers to identify a permanent location from the outset. The site plan attached at Appendix 5 provides an illustration of the preferred location which is situated to the rear of the Red Dragon Centre on unused land above the Butetown Tunnel. Confidential Appendix 6 provides visualisations of the proposed attraction.
17. Confidential Appendix 7 provides the proposed Heads of Terms for a lease to Skyview Towers. The terms reflect the nature of the site and its limited development potential given its position above the Butetown Tunnel, the capital investment required to manufacture the attraction, and the costs associated with citing the attraction in this location. The lease will be restricted to leisure use.
18. The preferred location has been subject to site investigations and whilst Confidential Appendix 8 identifies some of the site constraints, further investigations are anticipated in order to finalise drawings and proceed towards a planning application. The proposal is to enter into an Agreement to Lease on the terms outlined in Confidential Appendix 7 to provide the Skyview Towers with confidence to invest further in the proposal, to undertake further due diligence and to submit a planning application.

### **Commercial Considerations**

19. Both projects require a significant upfront capital investment and neither party is seeking a capital contribution from the Council. However, due to the known and unknown site constraints, both are seeking Agreements to Lease with an agreed long-stop date to deal with planning and further due diligence relating to the site constraints. Upon the successful grant of planning, the proposal is to enter into a lease with nominal rents to reflect the investments made. Confidential Appendix 9 provides a commentary on the existing use value of both sites and a breakdown of the estimated investments in both projects and assesses this as a market transaction in line with the Council's Procedure Rules.

## **Reasons for Recommendation**

20. To authorise the disposal of land by granting two leases, on the terms outlined in Confidential Appendix 3 and 7, to secure two new leisure attractions to Cardiff Bay.

## **Financial Implications**

21. This report is seeking Cabinet approval to enter into two separate leases on Council owned land, one with Nordic Urban in accordance with terms set out in Confidential Appendix 3 for land in Graving Docks area, as well as one with Skyview Towers in accordance with terms set out in Confidential Appendix 7 for land at Atlantic Wharf, both for the development of new visitor and leisure attractions funded by the private sector.
22. The Council is acting as the enabler of these development schemes, with limited financial implications to the Council in progressing further with these schemes. The only Council costs are likely to be the initial feasibility studies already carried out to demonstrate viability of these two developments in Cardiff to the private sector, as well as some legal and disposal fees relating to putting the appropriate lease arrangements in place. All other planning, design and development costs are to be met by the private sector. Further details are included within Confidential Appendix 9. The initial costs of feasibility studies, along with any necessary legal and disposal costs, will be met from within existing directorate budgets.
23. The Council currently has no obligation to carry out any other works, including public realm works in these areas, so there are no further direct cost implications to the Council as part of this proposal. If Atlantic Wharf is developed in line with the existing masterplan, the Council may wish to commit to undertake final landscaping and public realm works on the site for the purpose of consistency between the Atlantic Wharf public realm and the wider area. In this scenario, these costs will be funded as part of any future Atlantic Wharf schemes and will be subject to future Cabinet approval.
24. A Council Valuer has produced a valuation note on both the Graving Docks site and the land proposed to be leased to Skyview which is attached as Confidential Appendix 9. This note concludes that releasing this land in accordance with Heads of Terms set out within Confidential Appendix 3 and Confidential Appendix 7 would represent good value for money for the Council.
25. The VAT implications of this proposal will need to be considered and actioned as appropriate within relevant timescales ahead of completing these leases.

## **Legal Implications**

26. The Council has power to dispose of land, including the granting of leases, pursuant to section 123 of the Local Government Act 1972. When disposing of land, the Council must comply with its Acquisition and Disposal of Land Procedural Rules and have regard to advice from a qualified valuer annexed

to this report to ensure it is obtaining best consideration reasonably obtainable.

### Equalities & Welsh Language

27. In considering this matter the decision maker must have regard to the Council's duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are: (a). Age, (b) Gender reassignment (c) Sex (d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h) Sexual orientation (i) Religion or belief – including lack of belief.
28. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers ([WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 \(gov.wales\)](#)) and must be able to demonstrate how it has discharged its duty.
29. An Equalities Impact Assessment aims to identify the equalities implications of the proposed decision, including inequalities arising from socio-economic disadvantage, and due regard should be given to the outcomes of any required Equalities Impact Assessment.
30. The decision maker should be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

### The Well-being of Future Generations (Wales) Act 2015

31. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The wellbeing objectives are set out in Cardiff's Corporate Plan 2020 -23.
32. When exercising its functions, the Council is required to take all reasonable steps to meet its wellbeing objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the wellbeing objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
33. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without

compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

34. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible on line using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

#### Policy and Budget Framework

35. The decision maker must be satisfied that the proposal is within the Policy and Budget Framework, if it is not then the matter must be referred to Council.

#### **Property Implications**

36. The subject of this report is property related and therefore no additional comments are required.

#### **HR Implications**

37. There are no HR implications arising from this report

#### **RECOMMENDATION**

Cabinet is recommended to:

- 1) Agree in principle to dispose of land to Nordic Urban in accordance with the Heads of Terms set out in Confidential Appendix 3.
- 2) Agree in principle to dispose of land to Skyview Towers Ltd in accordance with the Heads of Terms set out in Confidential Appendix 7.
- 3) Delegate authority to the Director for Economic Development in consultation with the Cabinet Member for Investment and Development, the Section 151 Officer and the Legal Officer to deal with all matters relating to the completion of the disposals set out in recommendations (1) and (2) above.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Neil Hanratty</b> <b>Director of Economic Development</b>
	<b>9 December 2022</b>

*The following appendices are attached:*

Appendix 1 – Nordic Urban Site Plan

Confidential Appendix 2 - Nordic Urban Proposal – Graving Dock Presentation

Confidential Appendix 3 - Heads of Terms for Nordic Urban

Confidential Appendix 4 - Site Constraints Report

Appendix 5 – Skyview Towers Site Plan

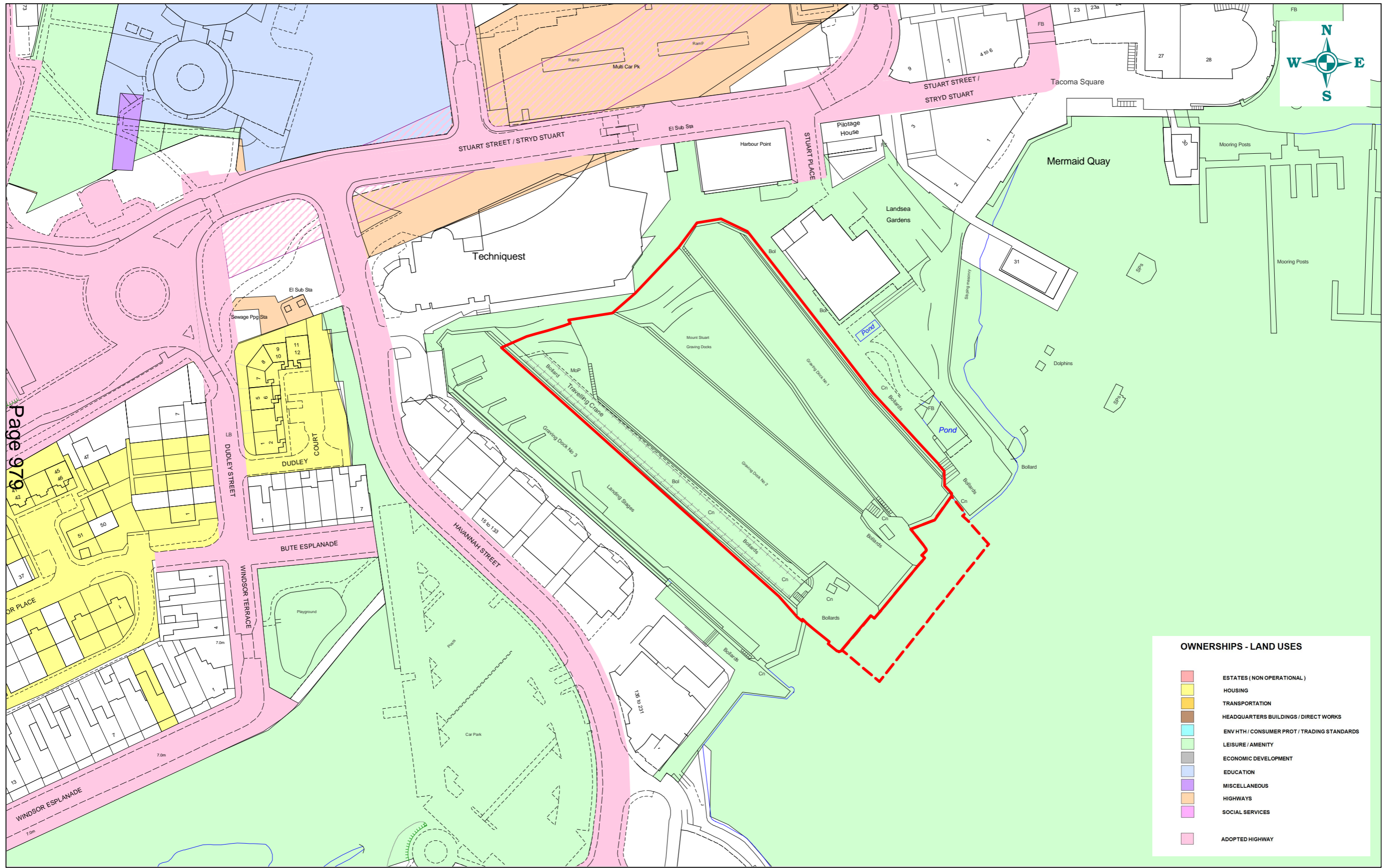
Confidential Appendix 6 - Skyview Feasibility Study

Confidential Appendix 7 - Heads of Terms for Skyview

Confidential Appendix 8 - Site Constraints Report

Confidential Appendix 9 - Valuation Note & Financial Summary

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**OWNERSHIPS - LAND USES**

[Pink]	ESTATES (NON OPERATIONAL)
[Yellow]	HOUSING
[Orange]	TRANSPORTATION
[Brown]	HEADQUARTERS BUILDINGS / DIRECT WORKS
[Light Blue]	ENVHTH / CONSUMER PROT / TRADING STANDARDS
[Light Green]	LEISURE / AMENITY
[Grey]	ECONOMIC DEVELOPMENT
[Light Purple]	EDUCATION
[Light Blue-Gray]	MISCELLANEOUS
[Light Orange]	HIGHWAYS
[Light Purple]	SOCIAL SERVICES
[Pink]	ADOPTED HIGHWAY

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Working for Cardiff, working together

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Cyfarwyddwr / Director : Neil Hanratty

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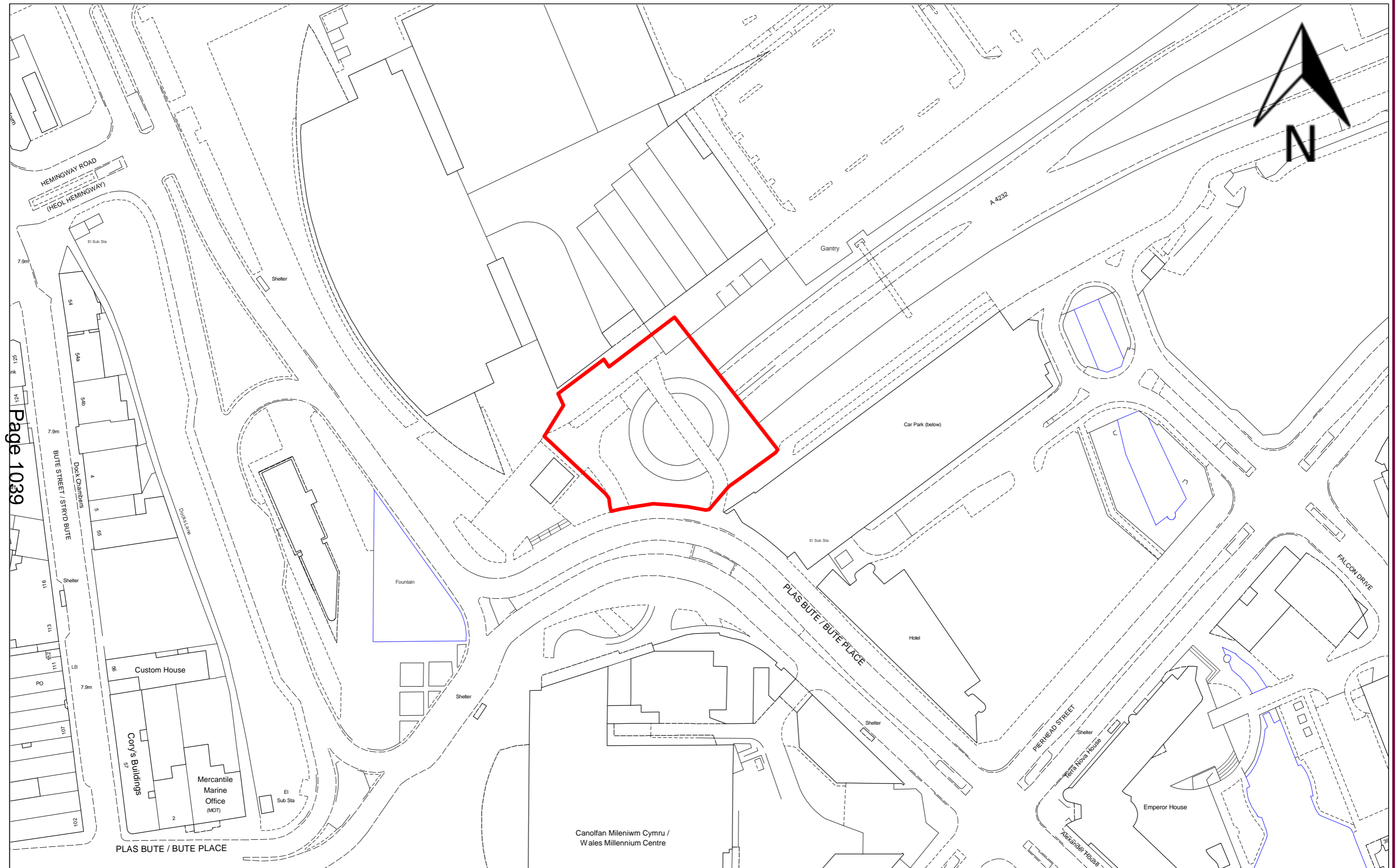
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**CABINET MEETING: 15 DECEMBER 2022**

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**CORPORATE SAFEGUARDING POLICY 2022-2025**

**FINANCE, MODERNISATION & PERFORMANCE (COUNCILLOR  
CHIRS WEAVER)**

**AGENDA ITEM: 10**

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**Reason for this Report**

1. The purpose of this report is to recommend Cabinet approval of Cardiff Council's Corporate Safeguarding Policy 2022-2025.

**Background**

2. Corporate Safeguarding describes both the policy commitment that the Council makes and the arrangements it has in place to ensure that all of its Directorates, employees and people working on behalf of the Council play their part in safeguarding and promoting the well-being of children and adults who may be at risk of harm.
3. The Corporate Safeguarding Policy sets out how Cardiff Council will meet its statutory duties towards the safeguarding of children and adults at risk of harm, as set out in Wales Safeguarding Procedures (2019) codes of practice and statutory guidance. It aims to give assurance to members of the public, service users, Elected Members, employees and people working on behalf of the Council that there are clear arrangements in place to safeguard and protect children and adults.
4. The Policy sets out an expectation that all Council staff and partners share an objective to help keep children and adults at risk safe by contributing to:
  - Creating and maintaining a safe environment
  - Identifying where there are concerns and taking action to address them in partnership with other agencies
  - Prevent unsuitable people from working with children and adults at risk
  - Ensure the whole workforce understands safeguarding and their accountabilities and responsibilities
  - Promote safe practice and challenge poor and unsafe practice

- In partnership with other public bodies and across the city, considering the risks that environments may present to children and adults at risk.
5. The responsibility for oversight of the Council's Corporate Safeguarding arrangements and performance is delegated to the Council's Corporate Safeguarding Board. The Board is chaired by the Cabinet Member with responsibility for Corporate Safeguarding, Councillor Chris Weaver, Cabinet Member for Finance, Modernisation and Performance and its membership includes the Chief Executive and Council's Senior Management Team.
  6. In July 2022 the Welsh Government published best practice guidance for local authorities in relation to Corporate Safeguarding. Cardiff Council actively contributed towards the development of this guidance, and it has been used as a basis for the development of this new Corporate Safeguarding Policy.
  7. The Corporate Safeguarding Policy is a 3-year policy but will be reviewed annually by the Council's Corporate Safeguarding Board and revised as required. The Corporate Safeguarding Board produces an Annual Report of progress and performance for Cabinet and Scrutiny. The Annual Corporate Safeguarding Report for 2021/22 was considered and approved by Cabinet in September 2022.

## **Issues**

8. The Corporate Safeguarding Policy sets out the following thematic areas of focus, as agreed by the Corporate Safeguarding Board.
  - i) **Safe Governance**
9. The Policy sets out clearly the governance arrangements and roles and responsibilities of all staff and elected members in relation to Corporate Safeguarding.
10. It also sets out the safeguarding self-assessment each directorate undertakes on an annual basis. The self-assessment is based on legislation and requires service areas to critically consider their own practice, procedures, systems and culture. The self-assessments identify areas and actions for improvement for each Directorate which are reported to the Corporate Safeguarding Board.
11. The actions for improvement, once agreed by the Board, are then included automatically in all Directorate Delivery Plans. Progress against the delivery of the actions is monitored by both the Corporate Safeguarding Board and via the Council Corporate Performance Management Framework (at mid-year and year end). This link to the Corporate Performance Framework was introduced in 2022/23 and represents a significant strengthening of the performance arrangements for corporate safeguarding.

12. A broader analysis of the self-assessments is also undertaken to identify cross cutting themes and gaps that can be addressed by the Corporate Safeguarding Board.

#### **ii) Safe Employment**

13. The Policy describes the Council's arrangements in relation to safer recruitment and employment for staff and volunteers to ensure children, young people and adults at risk are protected from abuse and harm.
14. This includes ensuring that relevant HR policies and procedures respond to national and regional safeguarding guidance, including the Recruitment and Selection Policy, Recruitment Policy, Disciplinary Policy and Volunteering Policy. In addition, the workforce is informed of the processes in place to raise and escalate any professional concerns staff may have via the Whistleblowing Policy or the Safeguarding Allegation / Concerns about Practitioners and Those in Positions of Trust Protocol.

#### **iii) Safe Workforce**

15. The Policy details the Council's approach to supporting the learning and development of all staff in relation to recognising abuse or the risk of abuse and knowing what actions take in response.
16. Corporate Safeguarding training is mandatory for all staff and elected members. This is predominantly completed via e-learning. To ensure the mandatory training is accessible and completed by all staff additional support and training methods have been developed to support non-PC users. Completion rates for training for each directorate are monitored by the Corporate Safeguarding Board and areas of low compliance identified for improvement action and additional support. The completion of Corporate Safeguarding training is also a Corporate Plan key performance indicator, and so is monitored quarterly as part of the Council's corporate performance framework. Completion rates at Q2 2022/23 are 80% against a corporate plan target of 85% for 2022/23.
17. In addition to ensuring all staff complete the mandatory training the Council has put in place additional communication and engagement activity on corporate safeguarding, including a new Quick Guide to Corporate Safeguarding and regular staff communications on safeguarding matters.

#### **iv) Safe Practice**

18. The Policy describes the safeguarding arrangements in place in Cardiff and the safeguarding practice embedded within the wider workforce. It also included a comprehensive overview of the preventative approaches delivered by the Council with partners to enhance the well-being of children and adults at risk. This includes;
  - Countering terrorism and the risk of radicalisation
  - Modern slavery and trafficking, including the national Referral Mechanism,

- Violence against Women, Domestic Abuse and Sexual Violence (VAWDSV) including the White Ribbon workstream
  - The suicide and self-harm prevention strategy
  - Transitional safeguarding and the work developing within the young person's multi-disciplinary team.
19. In line with Welsh Government best practice, the Policy also describes our joint responsibility, alongside other public bodies, to consider the risks that environments may present to children and young people, most importantly the Council's approach to contextual safeguarding and our Safeguarding Adolescents from Exploitation (SAFE) framework to identify and address contextual harm and exploitation.

**v) Safe Partnerships**

20. The ability to work with, share information and develop interventions across partnerships is crucial, and involves working in places and contexts that are not traditionally associated with children or adult social care. Key partners include other public services, the private sector (particularly those associated with the night time economy) and the third sector. The Policy sets out the Council's approach to working within a contextual safeguarding framework across a wide range of partners to increase the safety of children, young people and adults in our local community.
21. The Policy also outlines the commissioning arrangements in place to ensure our commissioned services have the necessary arrangements in place to safeguard children, young people and adults at risk. In addition, it sets out the expectation for any lettings and hiring arrangements that take place within the Council as well the licencing policy and the steps taken to ensure our licenced services comply with safeguarding requirements.

**Scrutiny Consideration**

22. The Community and Adult Services Scrutiny Committee is due to consider this item. Any comments received will be circulated at the Cabinet meeting.

**Reason for Recommendations**

23. To publish a new Corporate Safeguarding policy in line with the Council's requirement under the Social Services and Wellbeing (Wales) Act 2014.

**Financial Implications**

24. The Corporate Safeguarding Policy applies to the entire Council workforce (including agency workers, Elected Members, volunteers and contractors). The costs associated with the workforce carrying out their duties in conformance to this policy must be met within the respective directorate budgets. In the event of identifying any unbudgeted costs to

carry out any action required to conform with the policy it is essential that funding is identified prior to committing to the spend.

### **Legal Implications**

25. Equality Requirements: In considering this matter the decision maker must have regard to the Council's duties under the Equality Act 2010. Pursuant to these legal duties Councils must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are: (a) Age, (b) Gender reassignment, (c) Sex, (d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h) Sexual orientation (i) Religion or belief – including lack of belief.
26. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers (WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 (gov.wales) and must be able to demonstrate how it has discharged its duty.
27. Well Being of Future Generations (Wales) Act 2015: The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving seven national well-being goals for Wales – a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
28. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives relevant to this report are set out in Cardiff's Corporate Plan 2020-23. When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
29. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
  - Look to the long term;
  - Focus on prevention by understanding the root causes of problems;

- Deliver an integrated approach to achieving the seven national well-being goals;
  - Work in collaboration with others to find shared sustainable solutions;
  - Involve people from all sections of the community in the decisions which affect them
30. The corporate screening tool was used to identify whether any statutory impact assessments were required in relation to the Corporate Safeguarding Policy. As this is an internal policy which applies to all Council employees to promote the safety of staff, clients and residents, no negative differential impacts were identified and an Equality Impact Assessment was not required.

**HR Implications**

31. The Trade Unions have been consulted on the Policy which sets out the Council’s arrangements in relation to safer recruitment and employment for staff and volunteers to ensure children, young people and adults at risk are protected from abuse and harm. This Policy is supported by a number of HR policies which sets out processes for staff and managers to follow.

**Property Implications**

32. There are no Property implications arising directly from this report

**RECOMMENDATIONS**

Cabinet is recommended to approve the Cardiff Council Corporate Safeguarding Policy (2022-2025).

<b>Senior Responsible Officer</b>	<b>Sarah McGill Corporate Director People &amp; Communities</b>
	<b>9 December 2022</b>

*The following appendices are attached:*

Appendix 1 – Corporate safeguarding Policy 2022-2025

# CORPORATE SAFEGUARDING POLICY

2022-2025





# 1. INTRODUCTION





This Corporate Safeguarding Policy sets out how Cardiff Council will meet its statutory duties towards the safeguarding of children and adults at risk of harm, as set out in [Wales Safeguarding Procedures \(2019\)](#), codes of practice and statutory guidance.

It aims to give assurance to members of the public, service users, Elected Members, employees and people working on behalf of the Council that there are clear arrangements in place to safeguard and protect children and adults:

## **Safeguarding is Everyone’s Responsibility**

The Wales Safeguarding Procedures (WSP)<sup>1</sup> define safeguarding as:

**“Preventing and protecting children and adults at risk from abuse or neglect and educating those around them to recognise the signs and dangers”**

Safeguarding is the process of ensuring that across Cardiff:

- Every child and adult, regardless of their background, culture, age, disability, gender, ethnicity or religious belief, has a right to participate in a safe society without any actual or threatened violence, fear, abuse, bullying or discrimination.
- Every child and adult has the right to be protected from harm, exploitation and abuse.

Cardiff Council is committed to ensuring that people living in Cardiff are safe and protected and that its statutory duties to safeguard and protect children, young people and adults at risk are discharged effectively.



## 1.1 Corporate Safeguarding

Corporate Safeguarding is the activity required by all Council Directorates to effectively protect the health, wellbeing and human rights of children and adults so that they are able to live free from harm, abuse and neglect.

Corporate Safeguarding describes both the policy commitment that the Council makes and the arrangements it has in place, to ensure that all of its Directorates, employees and people working on behalf of the Council play their part in safeguarding and promoting the well-being of children and adults who may be at risk of harm.

## 1.2 Safeguarding is Everyone's Responsibility

The Social Services Well-being Act (SSWBA) imposes a duty on Local Authorities that ensures everyone – employees, agency workers, contractors, volunteers and Elected Members – have a role to play in protecting children and adults from harm, whether this is inside or outside the home. It is the Council's responsibility to ensure that everyone is aware of safeguarding in their day-to-day work for the Council and know when and how to raise concerns.

Corporate Safeguarding in Cardiff is delivered against the following thematic areas of focus:

- **Safe Governance**
- **Safe Employment**
- **Safe Workforce**
- **Safe Practice**
- **Safe Partnerships**

# 2. SCOPE



For the purposes of this policy, a child is defined as anyone who has not yet reached their 18th birthday.

An adult at risk is defined as an adult who is experiencing, or who is at risk of, abuse or neglect, has needs for care and support (whether or not the Council is meeting any of those needs), and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

‘Workforce’ is defined as those engaged by the Council, including permanent and temporary employees, students, volunteers, workers employed by employment agencies, contractors and consultants.

The policy covers the whole workforce, and whilst all have varied levels of contact with children, and adults at risk everybody should be aware of potential indicators of neglect and abuse and be clear about what to do if they have concerns.

The Council’s Elected Members have an essential role and responsibility for safeguarding and protecting children and adults at risk. Guidance about their safeguarding responsibilities are detailed in the Council’s Protocol: [“The Role of Elected Members in Safeguarding Children and Vulnerable Adults”](#).

# 3. OBJECTIVES

A photograph of a group of people in a meeting, overlaid with a semi-transparent green filter. In the foreground, a woman with blonde hair is looking down and to the right with a thoughtful expression. Behind her, other people are visible, some looking towards the camera and others looking away. The overall scene suggests a professional or collaborative environment.



The policy provides a framework which ensures that the whole of the Council's workforce are clear on their obligations to safeguard children and adults at risk, and ensures that all policies and practices within the Council are consistent and in line with stated values, which must underpin all work with children, young people and adults at risk.

The intention of this policy is to support and provide good governance, promote good practice and enables services to be delivered in a way that ensures children, young people and adults at risk are safe from harm and are able to fulfil their potential and live the lives they want to live.

This policy is intended to be enabling; to ensure that all parts of the Council understand how to put effective safeguards in place. This is a policy for a positive, preventative and proactive approach to safeguarding. To be effective, the policy must be owned and implemented across the Council and promoted in wider communities.

The policy will be underpinned by the Corporate Safeguarding self-assessment process and tool as the core control for overseeing the safeguarding processes. It will be applied across all Directorates to ensure that all safeguarding matters and concerns are reported on, and monitored, to ensure effective action planning and improvements are put in place.

# 4. PRINCIPLES OF THE POLICY

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There is an expectation that all of the workforce, and partners share an objective to help keep children and adults at risk safe by contributing to:

- Creating and maintaining a safe environment.
- Identifying where there are concerns and taking action to address them in partnership with other agencies.
- Prevent unsuitable people from working with children and adults at risk.
- Ensure the whole workforce understands safeguarding and their accountabilities and responsibilities.
- Promote safe practice and challenge poor and unsafe practice.
- In partnership with other public bodies, consider the risks that environments may present to children and adults at risk.

The policy sets out a preventive approach which ensures safeguards are proactively put in place to prevent abuse and neglect occurring.

The Council requires a competent workforce who are able to identify instances in which there are grounds for concern about the welfare of a child or adult at risk and initiate or take appropriate action to keep them safe.

The policy requires effective partnership working between all those involved with children, young people and adults at risk.





# 5. LEGISLATIVE CONTEXT

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The Council is committed to the 1945 Declaration of Human Rights, the UN Convention on the Rights of a Child, as well as the United Nation’s Principals for Older People.

[The Wales Safeguarding Procedures 2019](#) provide guidance for anyone who is working with children or adults in Wales, in the statutory, third or private sector; in health, social care, education, police, justice or other services.

[The Care Quality Commission \(2014\)](#) defined Safeguarding as “protecting individual’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.”

[The Social Services and Well-being \(Wales\) Act \(2014\)](#) (SSWBA) built on safeguarding practice in Wales to ensure that people are able to live their lives to the full. The Act contains an overarching duty to promote the well-being of people who need care and support together with an emphasis on shared responsibility and partnership working.

“Whilst the Council is the organisation in making enquiries to identify whether an individual is at risk of harm, or abuse, and co-ordinating a response it should be clear that safeguarding is everyone’s business and to this end this responsibility cannot be achieved in isolation and without clear and accountable leadership.” (Social Services and Well-being Act (Wales) 2014 (SSWBA))



# 6. **SAFE GOVERNANCE**

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## 6.1 Corporate Safeguarding Board

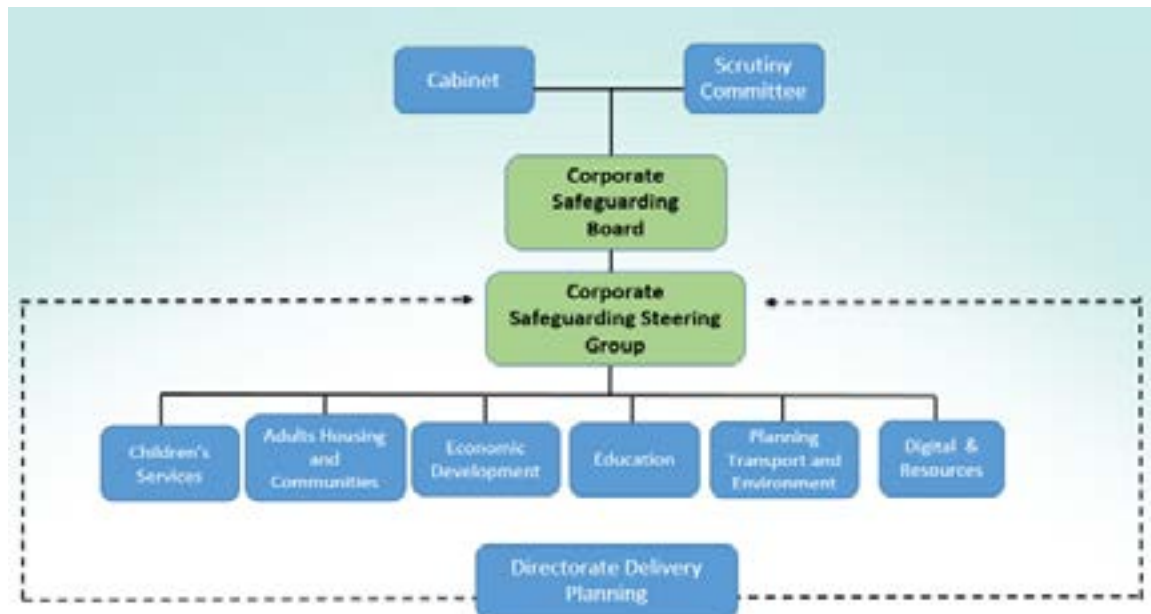
Corporate Safeguarding board is chaired by the Cabinet Member for Finance, Modernisation and Performance, Councillor Christopher Weaver and meets on a quarterly basis in line with the Terms of Reference ([Appendix A](#)).

## 6.2 Corporate Safeguarding Steering Group

The Corporate Safeguarding Steering group was newly established in May 2021 and is chaired by the Corporate Director for People and Communities. Each directorate is represented on the steering group by their Designated Safeguarding Person (DSP). The steering group works to deliver improvements and to act as a forum to share good practice, enable the cascade of information to teams and to identify any additional areas for improvement.

Corporate safeguarding governance arrangements can be seen below in Figure 1.

Figure 1: Governance Arrangements for Corporate Safeguarding





## 6.3 Roles and Responsibilities

### 6.3.1 All Staff

Every service area of the Council has a role to play and must take full ownership of their safeguarding responsibilities. The Council expects every member of the workforce to take all reasonable steps to ensure the safety of any child or adult at risk involved in Council activity.

Any person responsible for, or working with, children or adults at risk in any capacity, whether paid or unpaid, has a duty of care towards them both legally and contractually and as a responsible moral citizen. This includes a duty to behave in a manner that does not threaten, harm or put people at risk of harm from others.

All parts of the workforce have a responsibility to conduct themselves in their private lives in a manner that does not compromise their position in the workplace or call into question their suitability to work with children or adults at risk.

Everybody working for or on behalf of the Council has a duty to report any concerns they may have for the welfare and/or protection of children and adults at risk. The duty to report is a legal requirement and failure to report appropriately will be considered a serious matter under the Council's personnel policies.

ROLE	MAIN RESPONSIBILITIES
<b>Statutory Director of Social Services</b>	<ul style="list-style-type: none"> <li>• Legal accountability for ensuring the Council has appropriate safeguarding measures in place to protect children, and adults at risk.</li> <li>• Responsible for reporting the effectiveness of these arrangements on a corporate level to the Chief Executive, Senior Management Team, Cabinet, Council and the Corporate Safeguarding Board (CSB).</li> <li>• Point of contact for all other Directors to report serious safeguarding concerns which may occur in their service area.</li> <li>• Responsible for ensuring appropriate action is taken including reporting to the Chief Executive and Lead Cabinet Member as necessary.</li> </ul>



<p><b>The Chief Executive</b></p>	<ul style="list-style-type: none"> <li>• Overall responsibility for ensuring arrangements for safeguarding of children and adults at risk are effective across the Council.</li> <li>• Responsible for developing effective governance arrangements and ensuring there is a safeguarding policy in place.</li> <li>• Through one to one meetings with the Director of Social Services, the Chief Executive is kept informed of relevant safeguarding issues.</li> </ul>
<p><b>The Leader</b></p>	<ul style="list-style-type: none"> <li>• Overall responsibility for providing political leadership to ensure the Council fulfils its duties and responsibilities for safeguarding.</li> </ul>
<p><b>Cabinet Member for Finance Modernisation and Consultation</b></p>	<ul style="list-style-type: none"> <li>• Chair of the Corporate Safeguarding Board and the cabinet member with overall responsibility for the effectiveness of Corporate Safeguarding.</li> <li>• Hold regular one to one meetings with the Director of Social Services and be kept informed and updated on progress with regard to Corporate Safeguarding.</li> </ul>
<p><b>Cabinet Members for Social Services</b></p>	<ul style="list-style-type: none"> <li>• The Cabinet Members for Social Services are the cabinet members responsible for the protection of adults and children at risk.</li> <li>• The Director of Social Services will brief these cabinet members on the effectiveness of adult protection/child protection arrangements and sensitive cases which may become the subject of an adult practice or child practice review, or may otherwise become a matter of public interest</li> </ul>
<p><b>Directors</b></p>	<ul style="list-style-type: none"> <li>• Ensuring and assuring the effectiveness of safeguarding arrangements within their service area.</li> <li>• Reporting any serious safeguarding concerns that may arise in their service area to the Director of Social Services.</li> <li>• Briefing their respective Cabinet Members on any safeguarding issues and on the general effectiveness of safeguarding arrangements.</li> <li>• Ensuring the workforce within their Directorates are appropriately trained to identify and respond to safeguarding concerns.</li> <li>• Ensuring that they have safeguarding operational procedures in place and Safeguarding Self Evaluation Audits are undertaken for the relevant service areas within their Directorate.</li> <li>• Reporting to the Corporate Safeguarding Board on safeguarding risks in their service area and the effectiveness of their directorate safeguarding arrangements.</li> </ul>



<p><b>Elected Members</b></p>	<ul style="list-style-type: none"> <li>• All Elected Members have an essential role and responsibility for safeguarding and protecting vulnerable children and adults.</li> <li>• Guidance about their safeguarding responsibilities are detailed in the Council’s Protocol: “The Role of Elected Members in Safeguarding Children and Vulnerable Adults”.</li> <li>• Elected Members should access training on their responsibilities and seek advice from the Director of Social Services if they are unclear about their responsibility for safeguarding.</li> </ul>
<p><b>Scrutiny Committees</b></p>	<ul style="list-style-type: none"> <li>• The role of the Scrutiny Committees is to review and scrutinise decisions and make reports or recommendations in connection with the discharge of any of the Council’s functions whether by the Cabinet or another part of the Council.</li> <li>• The role is to provide constructive challenge to the Council about its safeguarding activity in an impartial and independent manner.</li> </ul>
<p><b>All Staff</b></p>	<p>Everybody employed, contracted or volunteering for Cardiff Council is responsible for:</p> <ul style="list-style-type: none"> <li>• Understanding and following this Policy and Procedure.</li> <li>• Understanding the signs of abuse, neglect or other forms of harm.</li> <li>• Be alert to the possibility of harm, abuse and neglect whether this is in the workplace during working hours or in areas of their private and public lives.</li> <li>• Reporting if they have any concerns that a child or adult is being abused, neglected or victim of other forms of harm or at risk of these things. This includes concerns about colleagues or other people working in the council.</li> <li>• Reporting any allegations that a child or adult has made</li> <li>• Undertaking any safeguarding training that has been identified for their job role.</li> <li>• Behaving in a way that is safe and appropriate for their role and following policies, procedures and guidance from the Local authority or other organisations or bodies that apply to them.</li> <li>• Helping promote safeguarding within their team and to members of the public.</li> <li>• Undertaking any roles and responsibilities related to safeguarding and protection that are specific to their job role.</li> <li>• Be familiar with local procedures and protocols for safeguarding and follow the Councils Code of Conduct and other professional codes.</li> </ul>



<p><b>Assistant Directors</b></p>	<ul style="list-style-type: none"> <li>• Through Departmental Management Teams (DMTs) ensuring that the workforce is aware of the Corporate Safeguarding Policy and that the annual self-evaluation is undertaken and actions addressed.</li> <li>• Ensure that safe recruitment practices are adopted particularly in relation to reference checks and where relevant, checks through the Disclosure and Barring Service (DBS). They should ensure the workforce are trained to the appropriate level.</li> <li>• All Assistant Directors must report any safeguarding concerns to their Director.</li> </ul>
<p><b>Managers</b></p>	<ul style="list-style-type: none"> <li>• Proactively analyse where risks to safeguarding are most likely to arise in their particular service(s) and ensure they have appropriate operational procedures and supporting systems in place to manage these well.</li> <li>• Understanding the training needs of their workforce and ensuring there are appropriate operational arrangements for people to access the right training.</li> <li>• Ensuring that the workforce for whom they are responsible (including agency, consultants and volunteers) receive the training they need, proportionate to their role and responsibilities.</li> </ul>
<p><b>Designated Safeguarding Person (DSP)</b></p>	<p>The Wales Safeguarding Procedures (WSP) defines a DSP as:</p> <p>The identified person within the organisation who is available to discuss safeguarding concerns. They should be consulted as to whether to raise a safeguarding concern with the local authority, will manage any immediate actions required to ensure the individual at risk is safe from abuse. All practitioners should know who to contact in their agency for advice and they should not hesitate to discuss their concerns no matter how insignificant they may appear.</p> <p>A current list of Cardiff Council DSP's is available <a href="#">here</a></p> <p>A full list of the roles and responsibilities of a DSP is detailed in <a href="#">Appendix B</a></p>





<p><b>Corporate Safeguarding Team</b></p>	<p>The Council’s Corporate Safeguarding Project Team provides support to all service areas and settings in Cardiff covered by this policy.</p> <p>The Team will support, challenge and hold to account all directorates, schools, service areas and partner agencies in respect of their safeguarding practices in the following ways:</p> <ul style="list-style-type: none"> <li>- Facilitate directorates, service areas, schools and partner agencies to undertake an annual audit of safeguarding arrangements.</li> <li>- Undertake regular review meetings / co-ordinate visits to Directorate Management Teams and other settings to discuss safeguarding procedures and practices.</li> <li>- Provide support and challenge to directorates regarding their safeguarding arrangements.</li> <li>- Provide clear signposts to professional advice and consultation regarding safeguarding or child / adult protection issues.</li> <li>- Support the Corporate Safeguarding Board in delivering its activity programme.</li> <li>- Support the Corporate Safeguarding Board in implementing a quality assurance framework for safeguarding.</li> <li>- Support the development of the DSP Steering Group for DSPs to support them in the effective discharge of their duties.</li> <li>- Lead on the implementation and development of action plans to meet the objectives of this policy.</li> <li>- Work with HR People Services in relation to safe recruitment and HR Practices and the development of a training plan.</li> <li>- Facilitate the roll out of safeguarding training across the Council to support services in meeting their training requirements.</li> </ul>
<p><b>Contractors, Sub Contractors or organisations funded by the Council</b></p>	<ul style="list-style-type: none"> <li>• Arranging checks through the safe recruitment process and for ensuring that staff comply with regulatory and contractual arrangements relating to their safeguarding responsibilities.</li> <li>• Informing relevant Managers within the Council of any safeguarding concerns they may have.</li> </ul>
<p><b>Agency Workers</b></p>	<ul style="list-style-type: none"> <li>• Undertake the relevant safe recruitment checks and references on any staff members offered employment / placements within the Council.</li> <li>• It is the responsibility of the Directorate/ line manager to draw the Agency Workers attention to the Corporate Safeguarding Policy as part of their induction process.</li> </ul>



## 6.4 Communications

A Corporate Safeguarding Communications plan is in place and will be regularly monitored and updated to ensure consistent messages in relation to the Council's corporate safeguarding duty are communicated to the whole workforce. Communications will be disseminated using a wide range of formats to ensure the key messages in relation to safeguarding are accessible for all, this will also make consideration to the first languages spoken by our workforce. Related safeguarding campaigns delivered by the Council will also include the corporate safeguarding message: Safeguarding is Everyone's Responsibility.

## 6.5 Reporting and Monitoring

The Council has an effective governance framework supported by a performance reporting system that is transparent, on line and capable of providing information for challenging scrutiny by Officers, Elected Members and Regulators.

At a corporate level, the responsibility for monitoring the effectiveness of safeguarding arrangements across the Council is delegated to the Corporate Safeguarding Board. The Corporate Safeguarding Board will produce a report at least annually for Cabinet and Scrutiny. This report will provide an overview of the Council's safeguarding performance. This will provide an opportunity for Elected Members to scrutinise and challenge the work of the Corporate Safeguarding Board.

A clear line of sight on reporting of safeguarding performance is also available through Directorate Delivery Plans which contain actions identified as a result of Directorate Self-assessments which are agreed and monitored by the Corporate Safeguarding Board, and are subject to scrutiny as part of the Council's Performance Management Framework.

The Director of Social Services will ensure the activities of the regional boards will be reported to Cabinet on a formal, regular basis.

Departmental Management Team meetings (DMT) will have safeguarding as a regular item on their agenda and will escalate risks, issues and training needs to the relevant DSPs.

Every Service in the Council will report on their safeguarding guidelines to the Corporate Safeguarding Board through their Directors.



## 6.6 Safeguarding Self- Evaluation Audit Framework

The Self- Evaluation audit tool ([Appendix C](#)) will be used to review and analyse compliance with the Safeguarding Policy by all Directorate Management Teams. The audit will be undertaken on an annual basis and information gathered will be used to improve safeguarding for children, young people and adults at risk.

The audit tool is based on legislation and is set out in sections which require service areas to critically consider their own practice, procedures, systems and culture.

The Safeguarding Self Assessments are embedded into the Council's Performance Management Framework. The self-assessments identify areas and actions for improvement for each Directorate, to be reported through to the Corporate Safeguarding Board. The actions for improvement, once agreed by the Board, will be included automatically in all Directorate Delivery Plans. Progress against the delivery of the actions will be monitored by both the Corporate Safeguarding Board (at mid-year and year end) and via the Council Corporate Performance Management Framework (at mid-year and year end).

Broader analysis of the return is also undertaken to identify cross cutting themes and gaps that can be addressed by the DSP Steering Group and / or the Corporate Safeguarding board.

## 6.7 Internal Audit / External Regulators

Internal Audit will consider reviewing safeguarding on a cyclical basis in accordance with their normal planning and risk assessment process along with all other services of the Council which could be subject to an audit review. Progress against recommendations for improvement from internal audit or external regulators will be reported to Corporate Safeguarding Board.

# 7. SAFE EMPLOYMENT

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## 7.1 Recruitment, selection and management of the workforce

The Council has implemented safe recruitment and employment standards in accordance with Safeguarding Children Board and Adult Safeguarding Board regional guidance and as set out in the Council's Recruitment and Selection Policy and Guidance.

The Council's Disciplinary Procedures set out the process for dealing with allegations that a member of the workforce has not complied with the Council's policies and procedures, including those in place to safeguard and promote the well-being of children and adults at risk. The policy also describes the sanctions that might be applied following investigation.

To promote safe recruitment and HR practices the Council:

- Ensures that the Safe Recruitment Policy is applied equally to the volunteers, agency workers and employees.
- Reviews its recruitment and selection procedures regularly and will carry out regular auditing on safe recruitment practices for the whole workforce.
- Ensures that managers responsible for recruitment receive safe recruitment training which is updated on a regular basis.
- Ensures that safe recruitment procedures are made accessible to and used by all managers.
- Monitors staff compliance with its policies for safeguarding and promoting the welfare of children, young people and adults at risk through training and auditing of HR processes.

## 7.2 Whistleblowing

Whistleblowing is defined as:

'The disclosure by a member of staff or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the work place, be it of the employer or his/her fellow employees' (Public Concern at Work Guidelines 1997).

The Council has an agreed Whistleblowing Policy (1.C.015) which refers to the reporting, by any member of the workforce, of suspected misconduct, illegal acts or failure to act within the Council. The whistleblowing policy can be used for confidential reporting of any abusive, inappropriate or unprofessional behaviour against any children or adults at risk, or any conduct that breaches criminal law or statute; compromise health and safety, breaches accepted professional code of conduct, or otherwise falls below established standards of practice in relation to children or adults at risk.



The Council expects the highest standards of conduct from the workforce, and encourages the workforce and others with serious concerns about any aspect of the Council's work to come forward and voice those concerns in a safe environment. The Whistleblowing policy enables members of the workforce to raise concerns at an early stage and in the correct way.

The Policy explains:

- The types of issues/disclosures that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern
- What the Council will do

### **7.3 Allegations against Adults who work with Children, Young People or Adults at Risk**

It is essential that all allegations of abuse are dealt with fairly, quickly and consistently, providing effective protection for the child or adult at risk while supporting the person who is the subject of the allegation. Allegations should be dealt with in line with the Wales Safeguarding Procedures 2019, and Regional Safeguarding Board Guidelines.

Referral forms for adults and children and the protocol entitled Section 5: Safeguarding Allegations / Concerns about Practitioners and Those in Positions of Trust can be found at: [www.cardiffandvalersb.co.uk](http://www.cardiffandvalersb.co.uk)

Child/Adult Safeguarding and Protection enquiries take priority over disciplinary investigations and determine whether investigations can be carried out concurrently.

The sharing of information about an allegation must be handled sensitively and must be restricted to those who have a need to know in order to:

- Protect children/ adults at risk
- Facilitate enquiries, or
- Manage disciplinary / complaints aspects

Information about the child / adult at risk must not be shared with an individual against whom the allegation was made or anyone representing them.

On the completion of Police and Social Services investigations, if formal disciplinary action is not required, appropriate action should be taken as soon as practicable.



Any member of the Cardiff Council workforce or employee of a contractor or subcontractor who believes that allegations or suspicions are not being investigated properly has a responsibility to escalate their concern to a higher level within the Council or via the Council Whistleblowing Policy – See above.

## 7.4 Volunteering

This Policy applies to all volunteers who engage with adults at risk, children and young people in their volunteering role and will be covered within the initial induction.

The Council has a Volunteering Policy which recognises the valuable contribution made by volunteers to the services provided by the paid workforce, with the ultimate aim of enhancing services for citizens and communities in Cardiff.

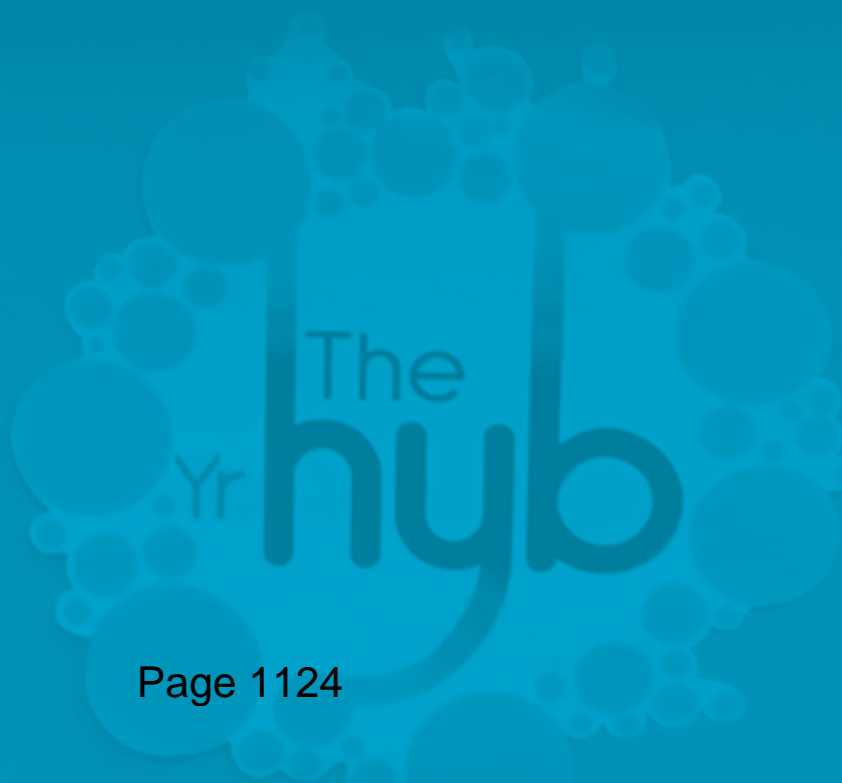
The policy sets out the safeguarding requirements which must be embedded in recruitment procedures for volunteers, and depending on the nature of volunteering roles, includes Disclosure and Barring service checks.

To support the introduction of the Volunteer Policy, the Council's HR system, DigiGOV, includes the ability for managers to record details of volunteers and when they are engaged in their areas, and information on safeguarding checks, where required.

A photograph of three staff members, two women and one man, wearing blue jackets with 'The hub' logo. They are gathered around a table, looking at a tablet held by the woman on the left. The background shows a library or office setting with bookshelves.

# 8. SAFE WORKFORCE

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## 8.1 Training

All members of the workforce, whether permanent or temporary, and volunteers who work with children and adults at risk in Cardiff will be given access to this policy and the name and contact details of their Designated Safeguarding Person (DSP) as part of their induction when they commence work.

All members of the workforce are responsible for their own Continuous Professional Development and to ensure that their safeguarding training is current and up to date. The Corporate Safeguarding Project Team will be responsible for informing Directorates of the Training Programmes. Attendance at training courses will be monitored through self-evaluation audits and reported back by each Directorate to the Corporate Safeguarding Board.

### 8.1.1 Mandatory e-module Training

All of the workforce will be expected to undertake the e-learning Corporate Safeguarding training module - Course: Modiwl Ar-lein Diogelu Plant ac Oedolion / Corporate Safeguarding Children & Adults Awareness Raising Online Module ([learningpool.com](https://learningpool.com)) and any other training relevant to the position that they hold and to renew their qualifications to the highest level.

It is a mandatory requirement for all of the workforce to undertake the Corporate Safeguarding training e-learning module.

The mandatory Corporate Safeguarding training is designed to ensure;

***If you see something wrong, or you're worried about something,  
then you report it.***

By completing the training module the workforce will

- know what the term safeguarding means
- know what to look out for
- know who to report to



### **8.1.2 Supporting Non PC Users**

There are some issues in easy access to the online training module for some groups of Council employees including non-PC users, events and casual employees, agency workers and volunteers. To address this a training framework ([Appendix D](#)) has been developed, setting out alternative methods of delivering the training.

Workers without access to electronic systems will be able to receive face to face / virtual training or have access to a paper based Training Workbook that can be completed and recorded via the academy using the Record of Prior Learning (RPL) Process ([Appendix E](#)). Mandatory corporate safeguarding training is to be refreshed every 3 years.

### **8.1.3 Recognition of those with other, relevant qualifications and training**

In line with WLGA best practice and aligned to the development of the National Safeguarding Training Standards, some staff with relevant approved prior training or qualifications may be exempt from being required to complete the online e-learning module. A list of approved training is available and compliance for this training can then be approved by the record of prior learning (RPL) process via the academy. ([Appendix E](#))

### **8.1.4 Elected Member Training**

Elected Members will have access to the Corporate Safeguarding e-module and are expected to complete this training in line with the expectation for all employees. Many Elected Members will have completed safeguarding training in other roles and this can be recorded via the record of prior learning RPL process. ([Appendix E](#))

### **8.1.5 Training Compliance**

The Corporate Safeguarding Board track and monitor training compliance for the Corporate Safeguarding E-module on a quarterly basis. To improve the tracking and monitoring of staff training compliance a data dashboard is available so that directors can easily see who has not completed the mandatory training module and take targeted action to improve compliance rates.

Discussions in relation to supporting staff in accessing the available training will be aligned with the Personal Professional Development Review framework.

# 9. SAFE PRACTICE

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Safeguarding practice must be delivered timely and effectively, to expected standards and with consistency in practice. The Council has effective safeguarding arrangements in place, and all safeguarding practice within the wider workforce (including partners, providers and volunteers) is continuously improving and working towards enhancing the lives well-being and safety of Cardiff citizens.

The Local Authority Social Services Strategy provides a clear overview of the current mechanisms in place to ensure the safeguarding of children and vulnerable adults.

## 9. Robust Protection

### 9.1.1 Child Protection

Child Protection is an essential part of safeguarding and promoting welfare. It refers to the activity which is undertaken to protect children who are suffering, or at risk of suffering significant harm, as a result of abuse or neglect.

The categories of abuse recognised within Child Protection are:

- Physical Abuse
- Sexual Abuse
- Emotional and Psychological Abuse
- Neglect
- Financial Abuse

The definitions of categories of abuse are outlined in the staff 'quick guide' found [here](#).

Whilst Statutory Social Service's Departments are the Lead Agency in Child Protection matters, there is a wider duty on all agencies to work together to protect and safeguard children. All members of the workforce have a duty to report child protection concerns.



## 9.1.2 Adult Protection

Adult Safeguarding is on a statutory basis under the SSWBA. Adult protection duties are undertaken in accordance with the Wales Safeguarding Procedures 2019.

The SSWBA refers to an ‘adult at risk from abuse or neglect’ which is defined as an adult who:

- Is experiencing or is at risk of abuse or neglect,
- Has needs for care and support (whether or not the authority is meeting any of those needs), and
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Adult safeguarding takes into account the capacity of adults to make decisions in accordance with the Mental Capacity Act (2005). If an adult is deemed to have capacity, then consent must be sought for the safeguarding process. The exception to this are when an alleged abuser is a potential risk to other vulnerable people or there is a wider public interest or a criminal offence is suspected.

The SSWBA also places a ‘duty to report’ on all staff to report actual or suspected abuse or neglect of adults at risk. It provides for the use of Adult Protection Safeguarding Orders (APSO) to allow Designated Officers to enter a premises where it is suspected an adult is at risk and speak to them alone to establish if they are safe.

Designated teams in the Adult Services, Housing and Communities directorate have statutory duties when an Adult at Risk is identified to make an enquiry and to decide what action should be taken and by whom to Safeguard the individual.

## 9.2 Prevention

The Council is committed to the development and commissioning of early intervention and preventative approaches to enhance the well-being of children and adults at risk.

Services operating within the Council will be expected to respond to the needs of children and adults at risk, understand how to establish a positive culture of safeguarding and adhere to the principles of partnership working in promoting prevention and early intervention. Critical to these approaches is understanding the potential safeguarding risks and addressing these proactively in the design of the service.



## 9.2.1 Counter Terrorism and the Risk of Radicalisation

The Counter-Terrorism and Security Act 2015 introduced the Prevent Statutory Duty which requires local authorities, schools, colleges, universities, health bodies, prisons, probation and police to have “due regard to the need to prevent people from being drawn into terrorism”. Local authorities and their partners have a core role to play in countering terrorism at a local level and helping to safeguard individuals at risk of radicalisation.

PREVENT covers all forms of extremism including religious extremism, extreme far-right, militant animal rights etc. The aim of PREVENT is to safeguard those who may be vulnerable to extremist influence and provide support to those who are at risk.

Referrals are made using the All Wales Partners Prevent Referral Form and a copy should also be sent via the Multi Agency Safeguarding Hub (MASH) at the same time as a PREVENT referral is submitted. Once it is ascertained that the referral is not subject to any other police investigations, a multi-agency panel known as the Channel Panel is held and a support plan is developed for the individual.

Channel is an early intervention safeguarding programme and an element of Prevent which provides bespoke support to children and adults identified as vulnerable to radicalization before they become involved in criminal terrorist related activity.

Channel works like other safeguarding interventions, identifying individuals at risk through referral, assessing the nature and extent of the risk and then developing a support plan for the individual concerned. It takes a multi-agency approach, involving a range of partners including the local authority, police, education, social services, health providers and others to tailor the support plan to the individual’s needs.

The type of support available within the Chanel programme is bespoke and can include help with accessing other mainstream services, such as education or career advice, dealing with mental or emotional health issues, substance abuse, and theological or ideological mentoring from a specialist Channel Intervention Provider, working with the individual on a one-on-one basis. It is to note that Channel is a voluntary and confidential programme.

## 9.2.2 Contextual Safeguarding

Children, young people and adults live, learn, work, play and visit in a wide range of settings: at home, in school and learning environments, peer/friendship groups, neighbourhoods, communities and online spaces. Whilst these interactions, activities and interplays are part



of growing up and learning to manage risk, the risks within those environments may often be more serious. Parents and carers have little influence over these contexts, and young people's experiences of harm outside the home can undermine parent-child relationships.

It is the Council's joint responsibility, alongside other public bodies, to consider the risks that environments may present to children and young people.

Protecting children and adults requires effective multi agency working and the cooperation of the wider community and partner agencies, to develop and implement co-ordinated activity, using local evidence and information, appropriately shared. The Council has a unique local and community leadership and advocacy role, working alongside the community, police and other public bodies, to ensure that children and young people remain safe in the places where they live and meet.

### 9.2.3 Exploitation

***Exploitation can take many forms and can occur in any location and can happen to anyone***

Exploitation is hidden and complex and abuses the basic human rights and dignity of victims who are subjected to it. Exploitation includes (list is not exhaustive):

- Modern Slavery/Human Trafficking
- Labour Exploitation
- Criminal Exploitation (including County Lines)
- Domestic Servitude
- Sexual Exploitation
- Forced Marriage
- Honour based violence
- Female Genital Mutilation (FGM)
- Radicalisation
- Financial Abuse
- Mate Crime
- Cuckooing

Victims may be subjected to one or more of these at the same time.

Exploitation can happen to anyone. It can be dangerous to make assumptions, generalise or rely on stereotypes when considering exploitation. Exploitation can happen to both adults and children. Exploitation can happen anywhere, including online. There is no single victim profile, no single perpetrator profile and no single pattern of exploitation.



## 9.2.4 Safeguarding Adolescents from Exploitation (SAFE)

Cardiff Council have developed a model of working that looks to identify and address contextual harm in our communities. The Safeguarding Adolescents from Exploitation (SAFE) model recognises that children and young people can be at risk of or subjected to harm through exploitation and abuse from adults and / or other peers outside of their family network.

Child exploitation could include one or a combination of the below:

- Child Sexual Exploitation (CSE),
- Child Criminal Exploitation (CCE),
- Modern Slavery and Human Trafficking (MSHT),
- Missing from Home (MFH)
- Online Child Exploitation (OCE)
- Wider Contextual Safeguarding

### **Safeguarding Adolescents from Exploitation (SAFE): Aims**

- To communicate and share information, discuss strategies and plan a multi-agency response in order to safeguard children from exploitation and contextual safeguarding risks in our communities.
- Build relationships with a wide range of professionals based in localities that can take steps to increase the safety of children in the area.
- Identify and share intelligence regarding the risks relating to locations that pose a risk to children.
- Explore ways in which we can enhance prevention and early intervention in order to build safe communities at the earliest opportunity.
- Develop robust locality partnership action plans to develop intelligence, pursue and prosecute perpetrators and disrupt exploitation activity within communities.
- To contribute to robust transition processes from childhood to adulthood.
- To work towards best practice in information sharing processes with all appropriate partners.
- Develop more effective use of data and evidence to ensure that approaches work and that they deliver better outcomes.





## 9.2.5 Modern Slavery / Trafficking

Modern Day Slavery encompasses slavery, sexual exploitation, human trafficking, forced labour, and domestic servitude. Traffickers and slave masters use whatever means they have to coerce, deceive, and force the individual into a life of abuse, servitude and inhumane treatment. The Modern Slavery Act came into law in 2015 and allows the courts to pass down severe sentences on the perpetrators, and to place restrictions on people from harm. In March 2017, Cardiff Council became the first public body to sign the [Welsh Government's Code of Practice: Ethical Employment in Supply Chains](#).

The Council acts in accordance with the relevant Modern Slavery and Trafficking legislation and guidance, and promotes practices to identify and safeguard victims of these crimes, and ensure transparency of supply chains. To this end the Council is working in partnership with Welsh Government, the wider public sector, suppliers, service providers and others to address Modern Slavery challenges and drive collaborative action with a view to reducing risks and incidence of modern slavery.

## 9.2.6 National Referral Mechanism

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of modern slavery. First Responder agencies including the police and local authorities have a statutory duty under Section 52 of the Modern Slavery Act to notify the Secretary of State when they identify a potential victim of modern slavery and in the context of children must therefore make referrals into the NRM.

This requirement in respect of potential victims of Modern Slavery is harnessed to responsibilities under the Social Services and Wellbeing (Wales) Act 2014 as set out in this Corporate Safeguarding Policy when, as an employee of the local authority, members of staff have a duty to report any safeguarding concerns in relation to a child or adult at risk.

The objective of the National Referral Mechanism is to provide effective decision-making on victims of modern slavery following referrals from the Home Office. It is essential that all who are identified as victims of modern slavery are connected to local support.

Report modern slavery as a first responder - [GOV.UK \(www.gov.uk\)](http://www.gov.uk)



## 9.2.7 National Referral Mechanism (NRM) Childrens Pilot

Since June 2021 Cardiff has taken part in a national pilot whereby the child's NRM decision making process is devolved to Local Authorities.

The NRM decision making panel is made up of core voting members who include senior staff from, Local Authority (Children's Services), Health and Police. A representative from the Independent Child Trafficking Guardian (ICTG) service is also mandatory at panels, but does not have decision making capabilities.

By building local mechanisms the quality and timeliness of decisions has improved as well as improvements and increased connectivity between existing safeguarding mechanisms and the NRM process.

## 9.2.8 Violence Against Women, Domestic Abuse and Sexual Violence - VAWDSV

Domestic Abuse is recognised to impact both adults and children and can have life changing effects. The Domestic Abuse Act (2021) recognises children to be direct victims. The VAWDASV Act (Wales) 2015 aim's to improve arrangements for the prevention of gender based violence, abuse, and sexual violence, and to ensure victims and survivors are supported and protected. . The National Training Framework is the main vehicle of delivery of The Act .

### **Group 1 e-learning module.**

All staff, regardless of role, are required to complete the mandatory National Training Framework Group 1 'Violence Against Women, Domestic Abuse and Sexual Violence' awareness raising module. The module, hosted by the Learning Academy, forms part of the Council staff induction.

### **Group 2 'Ask & Act'**

This is a mandatory training session for staff that engage with members of the public in roles where they might reasonably be expected to identify the signs of violence against women, domestic abuse and sexual violence. Ask & Act is a principle based approach to targeted enquiry that equips the staff member to follow the Act & Act referral pathway. Council staff who have line management responsibility are also encouraged to attend this training.



### **Group 3 - Workplace Champions**

Cardiff Council must also ensure that Group 3 'Workplace Champions' are in situ in all Directorates across the council so that they can provide support and advice to staff who may be required to 'Ask & Act'. The training complements the Designated Safeguarding Lead Officer training and therefore it is expected that some DSLO's will also complete this training.

### **Group 6 – Senior Leads**

Senior Leads across the Council are also required to complete the mandatory Group 6 of the National Training Framework (in addition to Group 1) to ensure that the cultural shift required to challenge and address the attitudes and beliefs that enable violence against women, domestic abuse and sexual violence to flourish are firmly embedded across the workforce.

## **9.2.9 White Ribbon**

Cardiff Council holds White Ribbon Accreditation. The Corporate Safeguarding Board maintains oversight of the delivery of the Council's White Ribbon Action Plan, including:

- Overseeing completion rates for the statutory Violence Against Women, Domestic Abuse and Sexual Violence staff and member training.
- Ensuring that Commissioning and Procurement policies reflect White Ribbon commitment.
- Corporate Communication and Leadership.
- Estates and Events.

## **9.2.10 Self-Harm / Suicide**

Self-harm is the name given to any deliberate act of self-injury or behaviour intended to cause harm to someone's own body.

[The Suicide and Self Harm Prevention Strategy](#) and associated action plan sets out the strategic aims and objectives to prevent and reduce suicide and self-harm in Wales. It identifies priority care providers to deliver action and confirms the national and local action required.



### **9.2.11 Transitional Safeguarding**

Harm, and its effects, do not stop when a young person reaches 18. Transitional safeguarding focuses on safeguarding young people from adolescence into adulthood, recognising that transition is a journey not a single event and that every young person will experience this journey differently.

A controlled Young Person's Multi-Disciplinary team (MDT) pilot was launched in will run until March 2023 which focuses on young people with complex and multiple needs, especially those presenting to homelessness services. The project will provide therapeutic intervention, support and treatment to young people who have complex support needs, using an assertive outreach model. The aim is to create pathways into mainstream services, intervene during a time of transition for young people moving from Childrens Service provision to Adults and to prevent repeat homelessness with young people who have complex needs.



# 10. SAFE PARTNERSHIPS

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The ability to work with, share information and develop interventions across partnerships is crucial, and involves working in places and contexts that are not traditionally associated with children or adult social care. In addition to public bodies (health, police, probation, education and social services) other, non-traditional partners to consider could include:

- Local businesses and shops
- Nightclub owners
- Theatre and music venues
- Shopping centres
- Takeaways
- Fast food outlets
- Local taxi or cab companies
- Cinemas Hotels, bars and restaurants, late night takeaways, off licences, cinemas or other licensed premises may come into contact with children and adults at risk of harm.

People who work in these industries are in a unique position to spot the signs of exploitation and other forms of abuse. Cardiff has established a Night-time Economy task and finish group to review how safeguards can be strengthened with these partners.

Training is available on exploitation and county lines and can be delivered to some key night-time economy sectors and targeted raising awareness operations have taken place in key hot spots in Cardiff.

As part of the Safeguarding Adolescents from Exploitation (SAFE) model a series of focus groups have taken place with professionals from a cross section of services based in local areas across Cardiff. The information gathered from the 'local assessments' is used to prompt partnership discussion and clear action with a wide range of multi-agency partners.

## 10.1 Commissioning Arrangements

Any new service provider commissioned to provide services to children or adults at risk will be required to undergo an accreditation process. The accreditation process is designed to ensure that the service is fit for purpose and has the necessary arrangements in place to safeguard those it is supporting and deliver a quality service. As part of the accreditation process checks will be made with other local authorities, regulating bodies and financial enquires. Providers will be required to provide information confirming their safeguarding policy and procedures.



Contract monitoring activity, either planned or unplanned, will include satisfying the Council that the provider is managing their responsibilities in regard to safeguarding and are operating in line with legislation, policy and procedures. Where required, confirmation will be sought of the services performance regarding safe recruitment practices, DBS checking and safeguarding referrals.

The Council publishes an annual Modern Slavery statement. The statement is signed off by the Chief Executive and Lead Cabinet Member and:

- Sets out the action taken in the previous year, and the actions to be taken, to ensure that there is no Modern Slavery and Human Trafficking in its own business or supply chains.
- Includes details of the targeted Modern Slavery training that will be available to Council employees.
- Includes a commitment that, where appropriate, the Council's tender and contract documentation will include clauses to ensure compliance with the Council's Safeguarding Policy and wider legislation.

## 10.2 Lettings and Hiring

With almost all casual lettings the Council will not be contracting the services of hirers. The Council nonetheless will allow its premises to be used for activities that may involve children, young people or adults at risk.

Therefore Managers have a duty to ensure, as far as is reasonable, that these activities also comply with safeguarding responsibilities. Members of the public may reasonably assume that because an activity is taking place within a Council setting, the Council has had due regard to safeguarding in entering into the arrangement.

In allowing use of Council premises, the onus must remain upon the hirer to ensure that safeguarding measures are maintained throughout. This is something that organisations are made aware of under safeguarding legislation and through their own organisational governing body, if applicable.

Managers should request to see and retain copies of relevant safeguarding documentation as proof that hirers and their staff comply with such measures on receipt of applications. Managers must also consider reporting any concerns about an individual's suitability to work with children, young people and adults at risk.



In the case of ‘one off’ children’s events, for example, a private birthday party, safeguarding legislation exempts such uses from the processes mentioned above but nonetheless this policy requires managers to be able to properly demonstrate due regard to safeguarding risks in agreeing any hiring arrangements.

### 10.3 Licensing

The Cardiff Council statement of Licensing Policy (2020-2025) sets out the four licensing objectives under the Licensing Act 2003, one of which is the “the Protection of Children from Harm”.

The Statement of Licensing Policy is concerned with the licensing of premises selling alcohol and the licensing of late night refreshment. In administering the statutory Licensing regime in this regard, all Responsible Authorities, including Social Services, are able to share relevant information and make representations in respect of individual applications for grant or variation of a licence. In addition, the Licensing team acts as a signpost to information, including any material that relates to Safeguarding advice.

The Council will continue to work with traders who require licences e.g. takeaway outlets, to provide assistance on how to recognise possible safeguarding issues, signposting as above. All staff within the Licensing team receive safeguarding training to assist with the performance of their roles. In their work with the taxi trade, Licensing staff are able to share relevant information with Police and Social Services in respect of the safeguarding of children, young people and adults at risk.

### 10.4 Education Establishments Roles and Responsibilities in Schools

The role of local authorities, governing bodies and proprietors of independent schools is set out in the [Keeping Learners Safe Guidance \(March 2022\)](#).



# 11. APPENDICES

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A - Terms of Reference – Corporate Safeguarding Board

B - DSP Roles and Responsibilities

C - Self-evaluation Audit Tool

D - Non-PC Users training framework

E - Record of Prior Learning Process



# APPENDIX A

## Corporate Safeguarding Board - Terms of Reference

Corporate Safeguarding describes both the policy commitment that a Council makes and the arrangements it has in place, to ensure that all of its Directorates and employees play their part in safeguarding and promoting the well-being of children and adults who may be at risk of harm.

Corporate Safeguarding is the activity required by all Council Directorates to effectively protect the health, wellbeing and human rights of children and adults so that they are able to live free from harm, abuse and neglect. In order to effectively implement these duties and activities, the Corporate Safeguarding Board must seek to ensure that all staff are compliant and fully understand their duties under the Act.

### **The Corporate Safeguarding Board (CSB) will:**

1. Ensure the compliance of all Council Directorates with key safeguarding requirements in relation to children and adults.
2. Ensure that all directorates within the council are aware of their contribution to keeping children, young people and adults at risk safe and free from harm or abuse.
3. Agree, implement and review clear actions for the group within a ratified annual action plan.
4. Support the Statutory Director of Social Services in the discharge of his/her wider safeguarding duties.
5. Review and develop relevant corporate safeguarding standards and policy.
6. Support HR in the delivery of a robust Safer Recruitment process to include key vetting and barring requirements and workforce development.
7. Provide an Annual Corporate Safeguarding Report, setting out the performance of all Directorates, in relation to vetting and barring, staff safeguarding training, and the operation of front-line services in terms of their effectiveness in identifying and referring safeguarding concerns.
8. To identify clear areas of safeguarding risk, and agree how the risks will be managed within the authority and by whom.
9. Review and develop appropriate corporate safeguarding performance measures.
10. Ensure that Safeguarding training is promoted and mandated across all Directorates within the authority.
11. Advise the Head of the Paid Service and recommend relevant action in relation to corporate safeguarding standards and policy.
12. Promote effective cross Directorate safeguarding practice particularly in terms of information sharing and data collection, front-line operational awareness, staff training and wider partnership engagement.
13. Receive and consider recommendations and learning from Child / Adult Practice / Domestic Homicide Reviews.



### **Membership**

Membership will include the Cabinet Member with responsibility for Corporate Safeguarding, the Chief Executive, Corporate Directors, Director (including the Monitoring Officer) from each Service Area or a representative Assistant Director, Head of Performance & Partnerships and the Corporate Safeguarding Project Manager.

## APPENDIX B

### Role Description for Designated Safeguarding Person (DSP) – Corporate Safeguarding

The Wales Safeguarding Procedures (WSP) defines a DSP as:

The identified person within the organisation who is available to discuss safeguarding concerns. They should be consulted as to whether to raise a safeguarding concern with the local authority, will manage any immediate actions required to ensure the individual at risk is safe from abuse. All practitioners should know who to contact in their agency for advice and they should not hesitate to discuss their concerns no matter how insignificant they may appear.

Each Directorate will have a Designated Safeguarding Person (DSP) responsible for safeguarding. The DSPs will be expected to attend a quarterly DSP Steering Group to support them in the discharge of their responsibilities.

Each directorate will identify a Designated Safeguarding Person (DSP) who will be responsible for dealing with all children and adult safeguarding issues that arise in their service area. Each service must ensure that all staff within their departments are notified of all DSPs across the service and how to contact them. The DSPs are responsible for:

- Ensuring all staff are aware of the 'Duty to Report' function of their role.
- Acting as a source of advice and support and signposting for staff in their Service on all safeguarding issues, including: -
  - Safeguarding Adults and Children
  - Violence against Women
  - Radicalisation, Extremism & Prevent
  - Child Sexual Exploitation
  - Modern Slavery
- Support staff or take the lead in referring safeguarding concerns.
- Ensuring all staff are aware of who the Directorate Safeguarding Lead is within their Department.
- Co-ordinating the annual Safeguarding Self-Assessment and ensuring that appropriate actions are contained within Directorate Delivery Plans.
- Ensuring safeguarding is regularly considered at Directorate Management Team meetings and that appropriate performance detail is provided to support the discussion.
- Attending and contributing to the quarterly Corporate Safeguarding DSP Steering Group. Sending a deputy if unable to attend.



- Acting as an overarching and key source of advice and support for other staff in their Service regarding safeguarding concerns; this will support and guide staff to make onward referrals where appropriate or to deal with any urgent or immediate issues they encounter in the course of their work;
- Being familiar with the Council's Corporate Safeguarding Policy ensuring that there are effective internal procedures to deal with concerns within the service by working closely with Social Services to achieve this;
- Representing their service on the Council's Corporate Safeguarding DSP Steering Board;
- Attending the relevant training for 'Designated Safeguarding Person's'.
- Ensuring staff within their area have had the relevant information/training;
- Reminding staff via team meetings, circulars etc. that any member of staff with concerns regarding the behaviour of a colleague towards children or an adult should contact the DSP within the service immediately;
- Ensuring the safeguarding responsibilities are highlighted during the induction process, team meetings, supervision sessions, PPDR process and staff briefings.
- Delegating their Safeguarding duties and responsibilities to an appropriate officer within their department to undertake the role on their behalf.
- Publicising and promoting national campaigns, including through organisations websites, social media or other mediums.



# APPENDIX C

## Corporate Safeguarding Self-Evaluation Audit

February 2022

### What is Corporate Safeguarding?

Safeguarding is keeping children and adults at risk safe from abuse- whether it is sexual, physical, emotional, financial or neglect- and other kinds of harm, such as exploitation and radicalisation.

More information on Corporate Safeguarding can be found here: [Corporate Safeguarding Information \(sharepoint.com\)](#).

### What is the Self-Evaluation?

All Directorates are responsible for safeguarding and must therefore ensure that the Corporate Safeguarding Self Evaluations (CSSE) is completed annually.

The purpose of the assessment is to identify areas where the Directorate requires improvement. Any actions identified will then be included in each Directorate's Delivery Plan. Progress against these actions will be reported to Corporate Safeguarding Board.

### Who should complete the Self-Evaluation?

Each Directorate is expected to submit a single self-assessment. However, given the diversity of services contained within each Directorate, **it is recommended that sections 3, 4 and 5 of the form are completed by each Operational Manager**, with any areas for improvement and actions collated by the Directorate and submitted.

The identified Corporate Safeguarding Directorate Lead Officer is responsible for co-ordinating this assessment, with sign-off before submission by Director/Assistant Director.



## Section 1: About your Directorate

### 1.1 Directorate

### 1.2 Service

### 1.3 Audit Completed by

### 1.4 Contact Details [Work e-mail address]

### 1.5 Date Returned (DD//MM/YYYY)



## Section 2: Safe Governance

This section should be completed at a Directorate-level.

### SAFEGUARDING LEAD OFFICER

2.1 Your Directorate has a named person (Safeguarding Lead Officer) with sufficient seniority to champion safeguarding (including vulnerable, exploited, missing / trafficked children and extremist / radicalised individuals) and vulnerable adults. Yes  No

2.2 Name of person Safeguarding Lead:

2.3 The Safeguarding Lead has sufficient safeguarding training. Yes  No

2.4 Is the Directorate Safeguarding Lead a member of the Management Team Yes  No

If no, do they attend the management team to report on safeguarding issues Yes  No

2.5 Do they attend the Corporate Safeguarding Steering Group? Yes  No

2.6 All members of staff are aware of who the safeguarding lead is? Yes  No

Supporting evidence and comments

Areas for improvement

Actions for Directorate Delivery Plans

Action	Responsible Operational Manager





**SERVICE PLANNING AND PERFORMANCE**

2.7 Are safeguarding actions included in your Directorate Delivery Plan? Yes  No

2.8 Where appropriate, are safeguarding actions included in services plans and personal reviews? Yes  No

2.9 Within your Directorate there are clear arrangements in place to evaluate the effectiveness of safeguarding, including policies, procedures, practice, and recruitment which are then used to further develop the service (Corporate Safeguarding Lead can advise). Yes  No

2.10 Performance data is current, accurate and subject to competent analysis. It is used to inform Directorate performance discussions and reported to the Corporate Safeguarding Board. Yes  No

2.11 Your Directorate carries out audits of cases / incidents in respect of safeguarding. Yes  No

2.12 Your Directorate shares the results of any related audits with the Corporate Safeguarding Board where multi-agency learning, patterns and trends can be identified. Yes  No

**Supporting evidence and comments**

**Areas for improvement**

**Actions for Directorate Delivery Plans**

Action	Responsible Operational Manager



**LEADERSHIP**

**2.13 Political, Board and Executive Leaders are familiar (where appropriate) with safeguarding and how it relates to your services**

Yes  No

**Supporting evidence and comments**

**Areas for improvement**

**Actions for Directorate Delivery Plans**

Action	Responsible Operational Manager



### Section 3: Safe Workforce

It is recommended that Sections 3, 4 and 5 are completed at a service-level / by individual Operational Managers, and the outputs are consolidated into a single Directorate-wide position.

#### STAFF ROLES AND RESPONSIBILITIES

3.0 Staff roles and responsibilities in respect of children (including vulnerable, exploited, missing / trafficked children and extremist / radicalised individuals) and vulnerable adults within your Service are identified. Yes  No

3.1 Safeguarding responsibilities are clearly identified in relevant individual job descriptions, and these are understood by staff. Yes  No

3.2 All staff and volunteers working with vulnerable people have the level of DBS appropriate to their role. Yes  No

**Supporting evidence and comments**

**Areas for improvement**

**Actions for Directorate Delivery Plans**

Action	Responsible Operational Manager



**STAFF AWARENESS OF SAFEGUARDING POLICIES AND PROCEDURES**

3.4 All staff in your service are made aware of what to do if they believe a child and / or vulnerable adult may be vulnerable or at risk. Yes  No

3.5 Staff in your service are aware of their statutory 'Duty to Report' issues of concern. Yes  No

3.6 There are systems in place which allow children and / or vulnerable adults to know where to get help i.e. Trusted Adult, advocacy etc. Yes  No

3.7 The Council has clear policies and procedures in respect of reporting concerns about radicalisation and extremism. Staff are aware of these and how to report concerns? Yes  No

3.8 Staff are aware of the Whistle Blowing Policy which encourages staff to safely report poor practice or any concerns. Yes  No

3.9 Safeguarding policies and procedures in your service are discussed annually as part of the annual development of the Directorate Delivery Plan process to ensure all policies are in line with current legislation and guidance. Yes  No

3.10 Staff understand when to share information in a legal and ethical manner if they have concerns that a child and / or vulnerable adult is at risk of harm or neglect. Yes  No

3.11 In the event of visitors, volunteers, external contractors, high profile visitors and fund raising activities on your service's premises, there are arrangements in place to ensure that children and / or vulnerable adults are safeguarded and their welfare promoted. Yes  No

Supporting evidence and comments



**Areas for improvement**

**Actions for Directorate Delivery Plans**

Action	Responsible Operational Manager

**TRAINING AND DEVELOPMENT**

**3.12 Your Service can evidence the safeguarding training it has provided, including the numbers trained and the type and level of training?** Yes  No

**3.13 Increasing the uptake of safeguarding training is discussed at Service Management Team meetings on at least a quarterly basis.** Yes  No

**3.14 Please provide details of your annual safeguarding performance data. Where targets have not been met, please outline your approach to achieving compliance.**

**Are there any staff within your service that do not receive any safeguarding training?** Yes  No

**Please Explain why**



**3.15 Safeguarding is included in your service induction programme for all relevant staff and volunteers.**

Yes  No

**3.16 Staff and volunteers with special safeguarding responsibilities have the appropriate training to develop the required skills and the opportunities to update their knowledge to work effectively with complex issues.**

Yes  No

**Supporting evidence and comments**

**Areas for improvement**

**Actions for Directorate Delivery Plans**

Action	Responsible Operational Manager



## Section 4: Safe Recruitment

4.1 Recruitment and Selection training has been provided to all staff involved with recruitment. Yes  No

4.2 Arrangements are in place to monitor compliance with safeguarding policies and procedures and with recruitment and selection policies and procedures (new DBS / DBS renewals / reference checks). Yes  No

4.3 Your service has rigorous procedures in place for recruiting anyone who has contact with children and / or vulnerable adults and for assessing their suitability to work with vulnerable people, where appropriate, are consistent with statutory requirements. Yes  No

4.4 A volunteer or anyone not considered to be in 'regulated activity' is required to complete a self-declaration in respect of previous convictions or inappropriate conduct towards children or adults. Yes  No

### Supporting evidence and comments

### Areas for improvement

### Actions for Directorate Delivery Plans

Action	Responsible Operational Manager



## Section 5: Safe Partnerships

Contract and Commissioning arrangements take account of the need to safeguard and promote the welfare of vulnerable people is informed, where appropriate, by the views of the vulnerable people and their families.

5.1 Safeguarding is integrated into all commissioning and contractual processes with clear expressions of the standards required alongside requirements to prevent and report concerns.

Yes  No

Supporting evidence and comments

Areas for improvement

Actions for Directorate Delivery Plans

Action	Responsible Operational Manager

### USABILITY AUDIT

Thank you for completing this audit. We would welcome any comments or feedback on this audit tool – please provide in the box below



# APPENDIX D

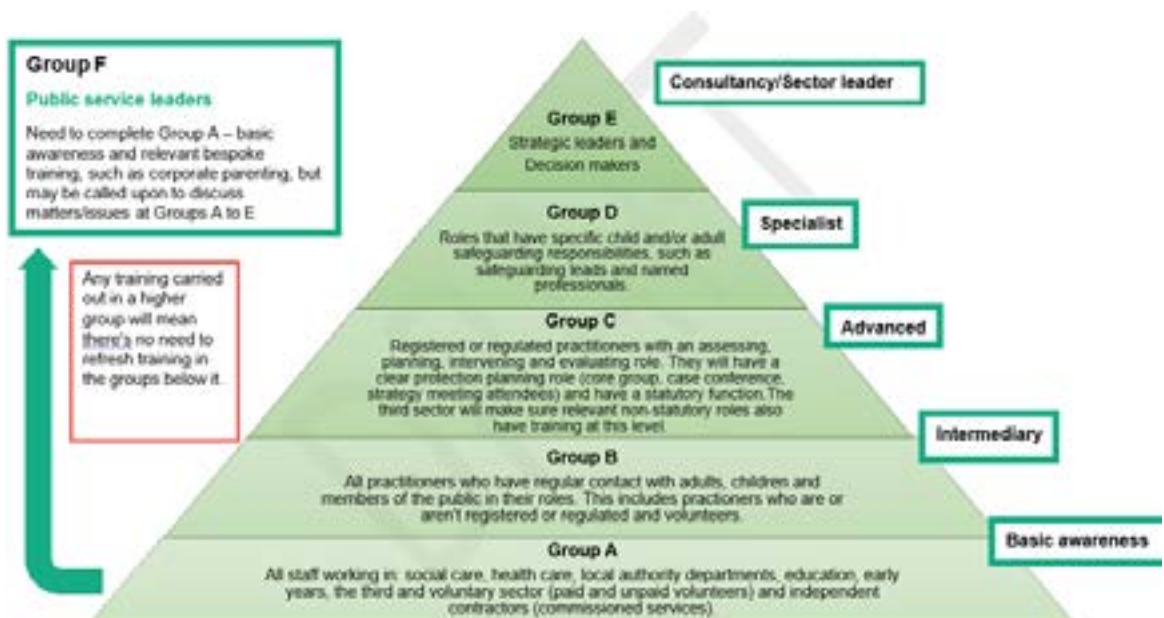
## Corporate safeguarding Training Framework (Non PC Users / Members / Volunteers)

Delivery of Corporate Safeguarding e-module content –Minimum Requirement to achieve training compliance as recommended by the WLGA National Safeguarding Training Standards for ‘Group A’ staff.

**Aim - If you see something wrong, or you’re worried about something, then you report it.**

- Group A**
- I know what the term safeguarding means
  - I know what to look out for
  - I know who to report to

Practitioner groups – hierarchy





**Options for Compliance for Non Desk Based Staff – Team manager will select most appropriate option on a case by case basis.**

Option	Compliance Achieved
E-module is sent via email to .gov account and staff member access via community hub / central office base	Compliance recorded via Academy
E- Module content is delivered via in-person training – cascaded via DSLO – Train the trainer provided (AS/CS training teams can support)	Compliance is uploaded via Digi gov – certificate of compliance is emailed / sent paper based
E- Module training is delivered as part of new staff induction – along side health and safety / corporate induction	As above
E module is delivered via teams as group / individual training – with mobile access supported	As above – explore mobile options
Learning pool account is set up (£5 per employee) and access is provided via any mobile device -	Compliance can be checked via learning pool reporting
Corporate safeguarding work booklet produced with key questions for staff to complete / submit and mark	Manager signs off compliance.

In addition, we are undertaking a review of the existing safeguarding training delivered by the local authority to ensure corporate safeguarding content is covered. This includes Safeguarding level 1-3 training courses that are delivered to all school DSP who cascade to all school staff and is also delivered via governor's services to governors.

If approved staff who have completed this training and/or hold a recognised safeguarding qualification could be exempt from completing the online module. For this, managers would need to submit a spreadsheet of staff members who could be signed off the central system.



**Ensuring key messages are disseminated and understood – in addition to / whilst awaiting compliance.**

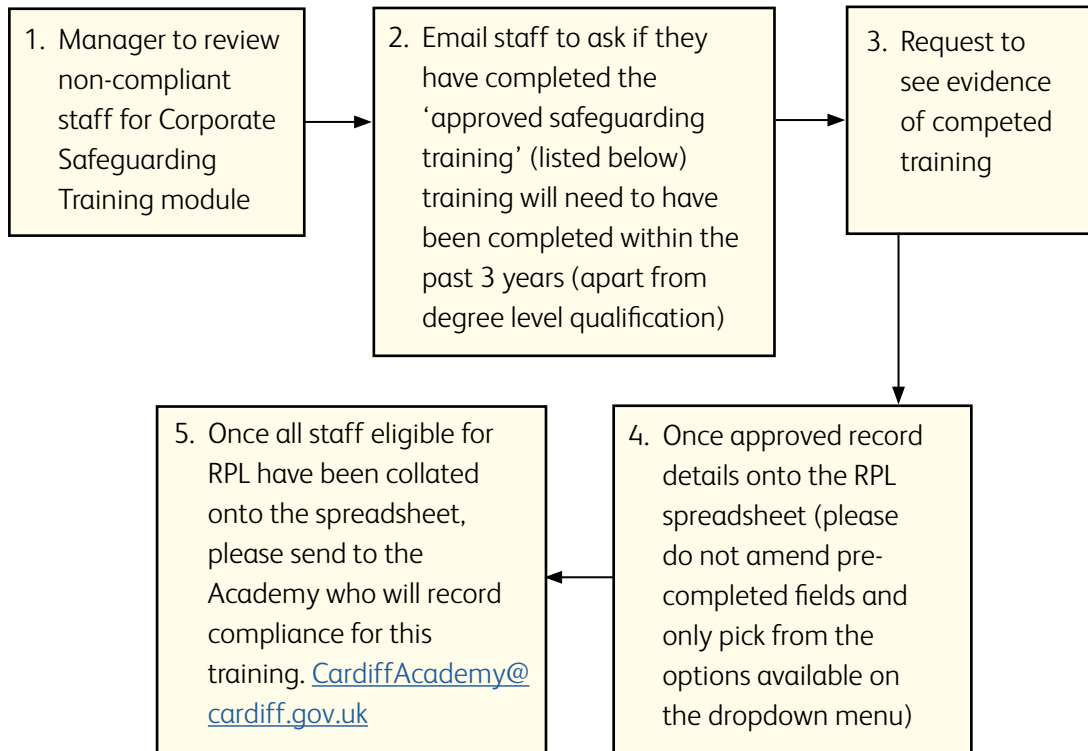
Plan	Notes
Regularly sharing safeguarding video / animation to all staff – this can be disseminated to non – desk-based staff via link in staff app / face to face in supervision / 1:1 / PDR sessions	Build into comms plan – check staff app capabilities / mobile access capabilities /
Quick Guide will be updated and circulated – paper copies will be made available	Will update using new updated e-module – comms support to make clear / visual
One page Briefing / key contacts will be made available – consider translation options	
Corp Safeguarding ‘regular reminders’ ‘Merch’ will be produced – Lanyards / Car stickers / Posters etc	
Wider comms plan to be developed	Will include key campaigns / VAWDSV/ Exploitation / Modern Slavery

**Note – to avoid unnecessary non- compliance**

- DSLO’s to ensure all managers ensure that staff upload any training certificates to digigov
- DSLO’s to ensure all managers approve training uploads via Digi gov

# APPENDIX E

## Corporate Safeguarding Record of Prior Learning



### List of approved training:

- Cardiff Corporate Safeguarding Workbook
- Social Work Degree (with ongoing registration)
- Corporate Safeguarding Level 1
- Corporate Safeguarding Level 2
- Corporate Safeguarding Level 3
- Corporate Safeguarding Chair of Governors Level 1
- Corporate Safeguarding Chair of Governors Level 2
- Corporate Safeguarding Chair of Governors Level 3
- Chaperone
- VAWDASV Ask and Act Level 2
- School Holiday Enrichment Programme (SHEP)

If there is any training that you believe should be added to the approved list – please send to [Rebecca.Brockway@cardiff.gov.uk](mailto:Rebecca.Brockway@cardiff.gov.uk) we will only add training to the RPL list if we are satisfied that all of the key messages within the corporate safeguarding e-module have been covered.

**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**CABINET MEETING: 15 DECEMBER 2022**

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**CORPORATE RISK MANAGEMENT - QUARTER TWO 2022/23**

**FINANCE, MODERNISATION AND PERFORMANCE (COUNCILLOR  
CHRIS WEAVER)**

**AGENDA ITEM: 11**

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**Reason for this Report**

1. To update Cabinet on the risk management position at quarter two 2022/23 and to highlight any changes from the quarter four 2021/22 report.

**Background**

2. Cabinet receives a risk management update on a biannual basis with the opportunity to make comments.
3. Each Directorate holds a Directorate Risk Register (DRR) and the Senior Management Team (SMT) collectively own a Corporate Risk Register (CRR). The CRR records the main risks to the delivery of corporate objectives and priorities, whilst the DRRs record the key risks to the delivery of Directorate functions and priorities.
4. A risk escalation process is in place, whereby each Director is required to take ownership of all residual (current) risks rated as 'red/amber' and above on their DRR and, at a minimum, to escalate all 'red' residual risks to SMT for collective ownership and review.
5. This reporting process allows SMT to determine if any changes are required to the CRR each quarter. The remaining escalated risks continue to be held on DRRs and are reviewed by SMT each quarter until it is agreed that mitigation is sufficient for risk ownership to transfer back to the Directorate.

**Issues**

6. Each Director has worked with their Risk Champion(s) to undertake their quarter two risk management review. The Risk Management Team has also provided advice and guidance on the measurement and reporting of risks. The quarter two risk assessments are presented on the Corporate Risk Register

Summary Snapshot (Appendix A) and the Detailed Corporate Risk Register (Appendix B).

7. Governance & Audit Committee receives a risk management update each financial quarter with the opportunity to make comments. The last Governance & Audit Committee review was on the 29<sup>th</sup> of November 2022, at which time the risk management position at quarter two 2022/23 was presented.
8. The Risk Management Review process has two tiers (Directorate and Corporate) and the actions at each for quarter two are detailed as follows.

### **Directorate Risks**

9. At the quarter two position, 271 risks were reported from DRRs. All escalated risks and requests for de-escalation were discussed and approved in SMT on the 17<sup>th</sup> of November 2022.
10. It was agreed that fifteen Directorate risks would be carried forward as SMT escalated risks at quarter two.

<b>Directorate</b>	<b>Directorate Risks</b>	<b>Risks at SMT Escalation Point</b>
Economic Development (inc Waste)	36	2
Education	22	0
Housing & Communities	35	4
Performance & Partnerships	17	1
Social Services	25	6 (1 Shared)
Planning, Transport & Environment	24	0
Resources	99	1
Governance & Legal Services	13	1 (Shared)
<b>Total</b>	<b>271</b>	<b>15*</b>

\* Includes 1 shared

### **Corporate Risks**

11. The escalated directorate risks and corporate risk updates were considered at the end of quarter two.
12. At quarter two, it was considered and agreed to a revised residual risk rating of both the Financial Resilience and Budget Monitoring corporate risk. The level of uncertainty in terms of funding pressures, pay pressures and increasing demand have heightened the level of response required to manage the level of potential risk. Whilst, the mitigations of in year savings are put in place, there is a need for the organisation to operate at a level where it can react to any further financial pressures in an effective manner. Further details of the

pressures and the response can be found in Appendix 2 of this report and the Cabinet reports Budget Monitoring Month 6 Report (17 November 2022) and the Budget 2023/24 Update (20 October 2022)

### **Reason for Recommendation**

13. To enable the Cabinet to monitor risk management activity and consider the Risk Management Review – quarter two 2022/23.

### **Legal Implications**

14. There are no direct legal implications arising from this report. However, one of the benefits of identifying risk is that mitigation measures may be taken, if appropriate, and consequently successful claims against the Council may be avoided altogether or reduced.

### **Financial Implications**

15. There are no direct financial implications arising from this report. The Corporate Risk register will be used to guide the Internal Audit Plan and the Council's resource planning processes and forms an important part of the governance arrangements for the Council.

### **HR Implications**

16. There are no HR implications for this report.

### **Property Implications**

17. There are no specific property implications arising from this report. The Estates Department continues to work closely with relevant service areas in monitoring property related risks through the Corporate Risk register, including identifying any appropriate mitigation measures

## **RECOMMENDATIONS**

Cabinet is recommended to note the content of the Corporate Risk Register.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Chris Lee</b> <b>Corporate Director Resources</b>
	9 December 2022

*The following Appendices are attached:*

- Appendix A** - Corporate Risk Register Summary Snapshot – Q2 2022/23
- Appendix B** - Detailed Corporate Risk Register – Q2 2022/23

*The following background papers have been taken into account:*  
*Directorate Risk Registers Q2 2022/23*

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# Corporate Risk Register Summary Snapshot Quarter 2 2022/23

Appendix A

Number of Risks by Inherent Risk Rating

Likelihood	A	A1 10	A2 1	A3	A4
	B	B1 6	B2 4	B3	B4
	C	C1	C2	C3	C4
	D	D1	D2	D3	D4
	E	E1	E2	E3	E4
		1	2	3	4
		Impact			

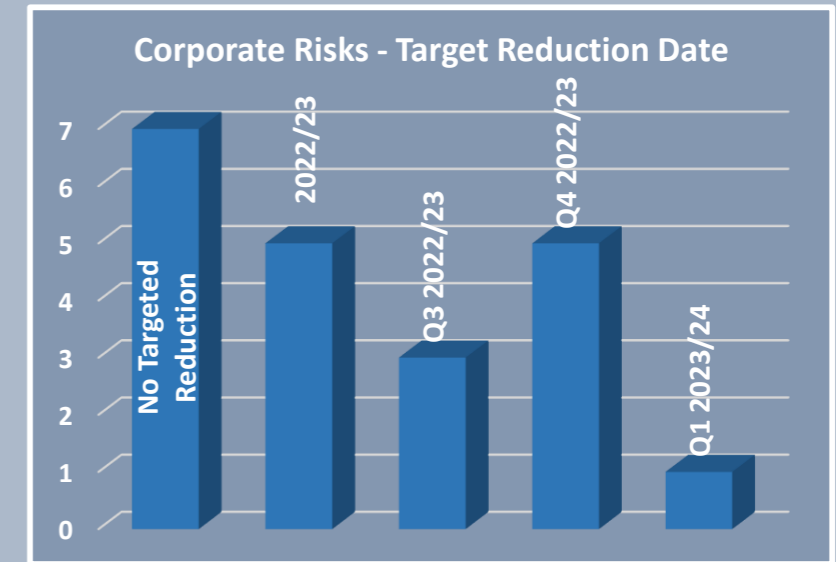
Number of Risks by Residual Risk Rating

Likelihood	A	A1	A2	A3	A4
	B	B1 3	B2 6	B3 1	B4
	C	C1 1	C2 3	C3	C4
	D	D1 3	D2 3	D3 1	D4
	E	E1	E2	E3	E4
		1	2	3	4
		Impact			

Number of Risks by Target Risk Rating

Likelihood	A	A1	A2	A3	A4
	B	B1 1	B2 1	B3	B4
	C	C1	C2 5	C3 2	C4
	D	D1 4	D2 5	D3 2	D4
	E	E1	E2	E3 1	E4
		1	2	3	4
		Impact			

Inherent Risk Rating	Corporate Risk Title	Residual Risk		Target Risk	
		Rating	Movement from Q1	Rating	Movement from Q1
A1	Climate Change	B2	↔	C2	↔
	City Security	B1	↔	B1	↔
	Air Quality & Clean Air Strategy	B2	↔	C3	↔
	Cyber Security	C1	↔	D1	↔
	Budget Monitoring (Control)	B2	↑	D2	↔
	Financial Resilience	B1	↑	C2	↔
	Schools Organisation Programme (Band B)	C2	↔	E3	↔
	Health and Safety	D3	↓	D3	↔
	Non-completion of Stat Building Eqpt Maintenance	C2	↔	D3	↔
	Information Governance	D1	↔	D2	↔
A2	Welfare Reform	B2	↔	B2	↔
B1	Coastal Erosion	B2	↔	C2	↔
	Waste Management	B2	↔	C2	↔
	Increase in Demand (Children's Services)	B1	↔	D1	↔
	Education – Schools Delegated Budgets	D2	↔	D2	↔
	Business Continuity	D1	↔	D1	↔
B2	Safeguarding	D1	↔	D1	↔
	Education Consortium & Attainment	B3	↔	C3	↔
	Legal Compliance	C2	↔	C2	↔
	Performance Management	D2	↔	D2	↔
	Fraud, Bribery and Corruption	D2	↔	D2	↔



**Key**

High (Red)	Medium (Red-Amber)
Medium (Amber-Green)	Low (Green)

↓ Decrease from previous quarter

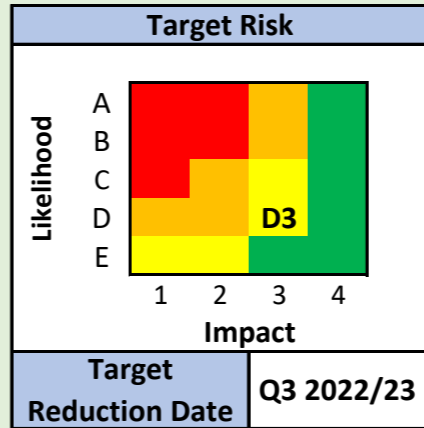
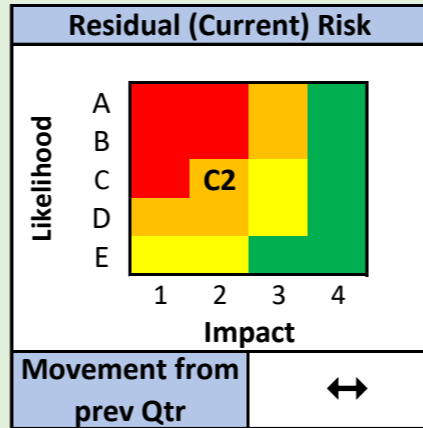
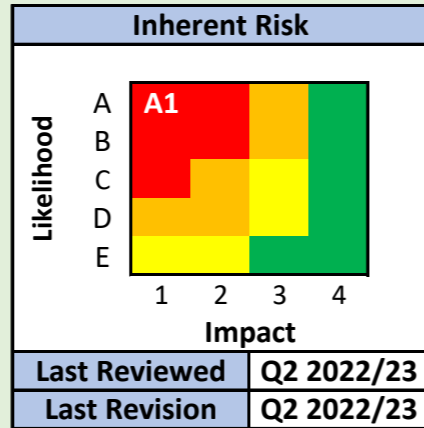
↔ No change from previous quarter

↑ Increase from previous quarter

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# Non-completion of Statutory Building Equipment Maintenance

**Description**  
 Non completion of cyclical statutory inspections or the remedial works arising out of the inspections, required to maintain the premises and related installations in a safe and legally compliant condition.



**Risk Owner(s)**

Neil Hanratty  
(Donna Jones)

Councillor Russell Goodway  
Investment & Development

**Potential Impact(s)**  
 Potential consequences of non-compliance with statutory maintenance:

- Fatalities or serious injuries
- Closure of part or whole of facilities with major disruption to service delivery
- HSE interventions and consequential actions including fines and prosecution;
- Significant additional expenditure requiring realignment of Corporate budgets;
- Temporary relocation of staff
- Temporary loss of operational service
- Invalidation of insurance policy
- Serious adverse impact on reputation
- Damage to fabric of building or other equipment

**What we've done/are currently doing to achieve the Residual Risk Rating**

Contractor

- Building Services have appointed a competent contractor to undertake Statutory Planned Preventative Maintenance (PPM) for which it is responsible. Consequential remedial work identified on test certificates.
- Improved statutory maintenance contracting arrangements in place from Q1 2019/20 inc. use of SFG 20 as specification for statutory obligations testing and new risk based specification for legionella management supported by RAMIS.
- FM competent person(s) review all test certificates, remedial work captured and communicated to client as necessary/applicable
- Statutory Obligations Team has been established within Building Services to improve monitoring and supervision of statutory obligations contractor. Contractors have been trained in the use of RAMIS in order for test certs to be uploaded directly to the system by contractors.

RAMIS IT Software

- RAMIS implemented across the Council with bi-monthly reporting on statistics to SMT;
- 500 Building Managers have received training in their responsibilities and use for the RAMIS system, including schools estates staff and Head teachers.
- Full time officer Administrating RAMIS, providing training and issuing reports from the system to all service areas to push compliance ratings up to a minimum of 80% set by SMT.
- Condition surveys have been completed which represents an extensive piece of work to improve our understanding and knowledge base of all the Council's land and property holdings.

Corporate Landlord Programme

- County Estates senior management structure established supporting - Strategic Asset Management, Capital Delivery and Property Services, to manage and deliver all the Council's non-domestic property functions within one portfolio. County Estates - Assistant Director appointed October 2020.
- The 'One Front Door' approach was rolled out across the corporate estate by end of Q4 19/20.

Statutory Obligation Compliance

- Continue to commission work to undertake required compliance testing (and works required) where Building Services has responsibility to do so, as defined on RAMIS.
- Continue to share testing/remedial performance statistics with all Directorates on a monthly basis.

COVID-19

- Following initial restrictions on the type of statutory compliance testing being undertaken in Council buildings a full testing programme is now in place. Access issues to some buildings following the COVID pandemic has caused delays to the undertaking of some testing and remedial works which has impacted upon the compliance statistics (completion of testing - target 80%, actual 78% (60% 12 months ago); completion of remedial works - target 50%, actual 64% (36% 12 months ago). Therefore, for this reason, the risk reduction target date has been changed to Q3, 22/23.
- Resolved remaining access issues to buildings that remained closed following COVID-19 all required statutory obligations testing has resumed and resulting remedial works identified.

Landlord / Occupancy Agreement

- Service area / County Estates building management principles established as business as usual in the Corporate Property Strategy 2021-26.
- Ongoing management through the established asset management / county estates controls and business processes

**What we plan to do to meet target**

Statutory Obligation Compliance

- Continue to commission investigations / work to complete required compliance testing (and works required) in respect of 'gaps' in compliance identified by reports from RAMIS. ONGOING
- Complete a review of arrangements in place to contract statutory inspections/maintenance for non-domestic Council premises, which are currently not being commissioned through the Statutory Maintenance Team (team moved to SED pending restructure) (Q3, 2022/23).

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
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**Linked Risks**

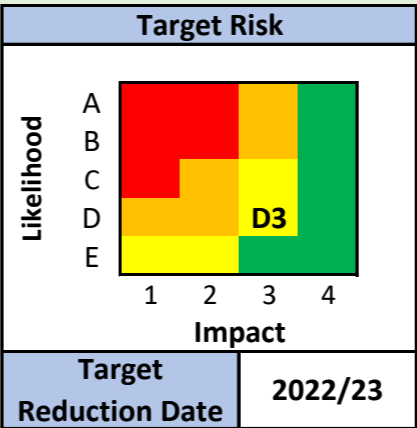
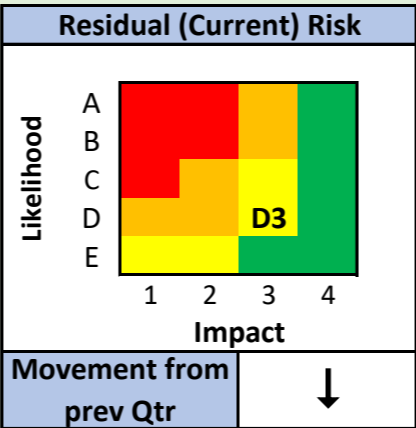
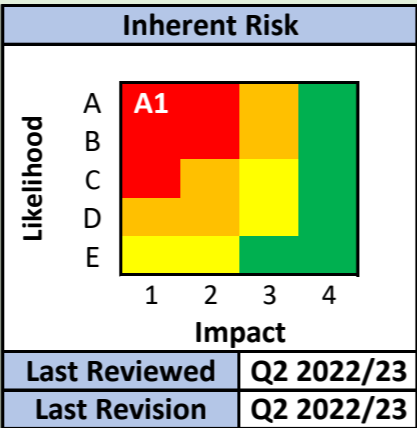
Health & Safety

**Key Indicators / Measures used to monitor the risk**

Compliance stats from the Corporate Health & Safety Team.

# Health & Safety

**Description**  
 Non Compliance with corporate Health and Safety arrangements to control key risks across the Council in line with statutory requirements.



**Risk Owner(s)**

Neil Hanratty  
 (Donna Jones)

Councillor Chris Weaver  
 Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- RAMIS - reporting recommenced using the new platform, reports submitted to Corporate Health & Safety Forum and Senior Management Team.
- Condition Surveys School Buildings - Complete Dissemination of Condition Survey information to schools as and when COVID-19 restrictions permit.
- Due to the continued pandemic H&S and OH resources will continue to be repurposed to support the workforce and limit the transmission of the virus in Council workplaces, as well as setting policy and guidance in relation to infection control and mental health and wellbeing support. From September 2021 the H&S Team resumed normal operations in addition to supporting issues related to COVID-19. In Q4, 2021/22 OH resumed face to face appointments and health surveillance.
- HSE visited 10 Cardiff Schools to review COVID-19 arrangements went well with positive feedback provided and no corrective actions required.
- Procedures to support the safe operation of the fire suppression system in Lamby Way MRF completed and Fire Risk Assessment updated, closing out insurance fire safety improvements.
- Training webinars for building management for community organisations operating Council premises to roll out when COVID-19 restrictions permit.
- Continue Asbestos Training - Online and face to face in line with COVID-19 Safety measures is currently taking place, the Asbestos Team recently gained approval from UKATA to deliver Non-Licensable Asbestos training. Commenced briefing sessions for technical departments and Building Managers to ensure they understand their responsibilities under the Corporate Asbestos Management (CAM) Plan.

**What we plan to do to meet target**

- No additional action identified to mitigate. Continue to monitor embedding of current controls to reduce the overall risk **ONGOING**

**Potential Impact(s)**

- Fatalities
- Serious injuries
- Prosecution – fines for corporate body and/or fines/prisonment for individual
- Civil Claims
- Negative Publicity

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial

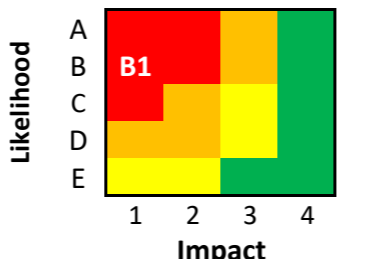
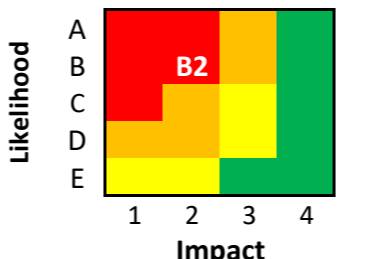
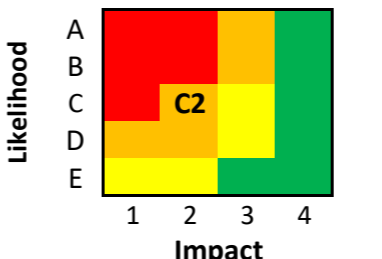
**Linked Risks**

Non-completion of Statutory Building Equipment Maintenance

**Key Indicators / Measures used to monitor the risk**

RAMIS is used to monitor statutory risk in relation to premises safety, bi-monthly reporting to SMT, quarterly reporting to Health and Safety Forum.  
 Compliance against annual Corporate H&S Objectives, used to monitor improvement secured in Service Areas, reported to Health and Safety Forum.

# Recycling Performance

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)								
<p>Failure to deliver recycling performance to meet statutory recycling performance targets within waste directive</p> <p>On 26 November, the final validated 2019-20 Local Authority Recovery Target (LART) showed Cardiff achieved a recycling performance of 58.14% compared to the target of 64%</p>	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p>	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p>	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p>	<p style="text-align: center;"><b>Neil Hanratty</b> (Matt Wakelam)</p> <p style="text-align: center;"><b>Councillor Caro Wild</b> Climate Change</p>								
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Potential Impact(s)
<p><b>Financial</b></p> <ul style="list-style-type: none"> <li>Penalties and loss of grant support</li> <li>Continuing financial costs to service</li> </ul> <p><b>Legal &amp; Regulatory</b></p> <ul style="list-style-type: none"> <li>Failure to comply with waste directive, leading to sanctions, penalties or interventions</li> </ul> <p><b>Strategic/ Reputational</b></p> <ul style="list-style-type: none"> <li>Reputational consequence with citizens and key stakeholders</li> </ul>

What we've done/are currently doing to achieve the Residual Risk Rating
<p>Cardiff's Recycling Strategy</p> <ul style="list-style-type: none"> <li>Recycling Strategy for Cardiff, which sets out the Council's long-term objectives over the next 5 years and considers economic, social and environmental aspirations, to ensure Cardiff is one of the leading cities in the world for recycling was approved at September 22nd 2022 Cabinet meeting;</li> </ul> <p>Agreement in principle be given to the programme of change set out in the Recycling Strategy 2022-25: 'Greener and Cleaner' and this report and delegate authority to the Director of Economic Development in consultation with the Cabinet Member for Climate Change to roll-out the phased implementation of the programme including: Agreement in principle be given to the programme of change set out in the Recycling Strategy 2022-25: 'Greener and Cleaner' and this report and delegate authority to the Director of Economic Development in consultation with the Cabinet Member for Climate Change to roll-out the phased implementation of the programme including:</p> <ul style="list-style-type: none"> <li>The phased roll-out of segregated recycling as set out in this report across household properties in Cardiff.</li> <li>The phased roll-out of reduced residual waste collections as set out in this report to improve the level and quality of recycling across household properties in Cardiff</li> <li>Undertake further pilot work in relation to Houses of Multiple Occupancy and Flats to improve recycling performance including the testing of communal segregated recycling bins.</li> <li>Review the expansion of kerbside collection services to cover items currently not collected at the kerbside.</li> <li>Enhance and strengthen education and enforcement to deliver improved recycling compliance across household properties in Cardiff.</li> <li>Develop the business case to move from a Material Recovery Facility to a Material Handling Facility required to manage segregated recycling</li> </ul> <p>Improvements to the trade / business waste model to improve recycling and meet new legislative requirements.</p> <p>Identification of wider Council / service area change to value resources and minimise the Council's impact on climate change.</p> <ul style="list-style-type: none"> <li>the plans to enhance the cleansing service, including the move balanced resourcing and 'same day cleanse' following collections for inner wards be noted.</li> <li>the development of a business case for a future repair and re-use 'superstore' be noted. A further report will be brought regarding the business case.</li> <li>Pilot for reusable sacks and segregated recycling commenced 24th Jan 2022 - participation 4000 properties and is now complete.</li> </ul> <p>Wider Governance &amp; Compliance</p> <p>On 18 November 2021, the final validated 2020-21 Local Authority Recovery Target (LART) showed Cardiff achieved a recycling performance of 55.79% compared to the target of 64%.</p> <ul style="list-style-type: none"> <li>Working in partnership with WG, WRAP &amp; WLGA to deliver new Recycling Strategy, Implementation Plan &amp; individual business cases</li> <li>segregated recycling modelling and business case</li> <li>material recovery facility to material handling facility, outline design and business case.</li> <li>development of blueprint model for flats, working in partnership with Swansea council</li> <li>trade business waste recycling review in preparation of new legislation</li> <li>Programme Board developed to review individual business cases prior to decision making process - Officer/ Cabinet/ Council decisions -</li> <li>A review of the performance of the Recycling Centres has been undertaken as part of Recycling Strategy, reviewing the controls at the recycling centres - completed</li> </ul>

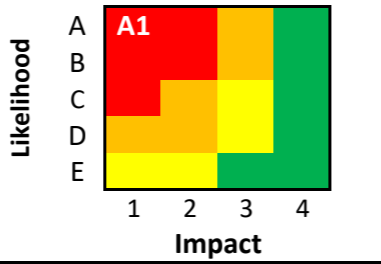
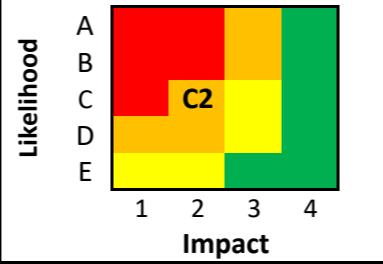
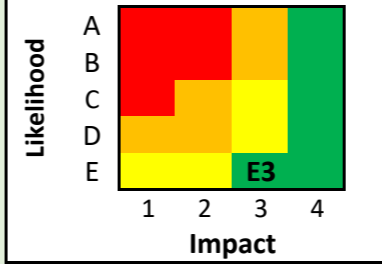
What we plan to do to meet target
<p>Cardiff's Recycling Strategy</p> <ul style="list-style-type: none"> <li>Development of business case following completion of the pilot for reusable sacks and segregated recycling - the pilot data will inform the business case for phased citywide roll out - Q3 2022/23 .</li> <li>Expansion of segregated recycling to be implemented in existing pilot areas alongside further ward expansion from 29th Nov 22 - Q3 2022/23</li> <li>Outline business case to be developed for a future repair and re-use 'superstore' - Q4 2022/23</li> <li>Recycling Performance Targets set within the Strategy are: 2021/22 = 64% - current performance for year is 59.59% (unvalidated) 2022/23 = 64% - Q1 performance is 64.53% (unvalidated) 2023/24 = 66% 2024/25 = 70%</li> </ul> <p>Wider Governance &amp; Compliance</p> <ul style="list-style-type: none"> <li>Senior Management to have ongoing regular engagement and discussions with WG and WRAP on Cardiff's Recycling Strategy and collaborative working model - fortnightly meetings ONGOING</li> <li>Quarterly meetings with Julie James MS, Minister for Climate Change, and WG to monitor actions to improve recycling performance ONGOING</li> </ul>

Type(s) of Impact
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal &amp; Regulatory</li> <li>Financial</li> </ul>

Linked Risks
<p>Workforce &amp; supply chain issues - Directorate Risk Register risks:</p> <p>RNS7 - Rising Fuel Costs</p> <p>RNS8 - Extreme Global External Factors</p>

Key Indicators / Measures used to monitor the risk
<ul style="list-style-type: none"> <li>Quarterly monitoring recycling % from waste data flow - 20/21 impacted by Covid-19: Q1= 43.67% Q2= 59.83% Q3= 58.36% Q4= 60.55 Total final validated 20/21= 55.79%</li> <li>Monthly tonnage monitoring</li> <li>Monthly financial monitoring in each area of waste</li> </ul>

## Schools Organisation Programme (Band B)

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Failure to deliver on aspects of the School Organisation Programme, which is significant in value and complex. The programme consists of Band B (£284m) 21st Century Schools, asset management improvement work, ICT and sufficiency projects. The programme of work spans across a number of directorates, requires significant capacity and has significant capital spend.</p>	 <p><b>A1</b></p>	 <p><b>C2</b></p>	 <p><b>E3</b></p>	<p><b>Mel Godfrey</b> (Richard Portas)</p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
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Target Reduction Date	Q4 2022/23												
What we've done/are currently doing to achieve the Residual Risk Rating			What we plan to do to meet target										
<ul style="list-style-type: none"> <li>21st Century Schools Band B funding bid was submitted to Welsh Government in July 2017 and the Strategic Outline Case for £284m was approved in November 2017. Two Cabinet Reports in October and December 2018 outlined the priorities for this second phase of funding. SOP reports for Fitzalan, Doyle Avenue, Cathays and St Mary the Virgin have been considered by Cabinet under Band B. Progression of these schemes was delayed as a result of COVID-19 but are now under way. A review of Band B has been completed and identified the priority projects to progress. Further work is required to establish Band C priorities.</li> <li>Successfully negotiated COVID-19 clauses with contractors for ongoing projects such as Fitzalan.</li> <li>Work is ongoing to make sure that all learners have access to digital devices, network and infrastructure to support mobile and distance learning.</li> <li>Robust governance model, in line with Corporate Landlord approach is in place and is supporting consistent decision making.</li> <li>Finance have re-profiled the capital and revenue budgets to assess the required budgets for each scheme. There are ongoing discussions with Welsh Government to assess the affordability of the programme in light of the current programme. The Council is considering additional asset funding in light of the pressing needs.</li> <li>Implementing more robust management and monitoring processes for the asset improvement programme, including the three "D" category High Schools, Fitzalan, Cantonian and Willows.</li> </ul>			<ul style="list-style-type: none"> <li>Develop a high level SOP Strategy that outlines the short/ medium and long term aims of the whole programme. The SOP Strategy will be underpinned by the ongoing Band B review. <b>Q4 2022/23</b></li> <li>Strengthening of the capacity of the SOP team critical to ensuring effective delivery of the different elements of the programme. Developing capacity includes ensuring that corporate colleagues in departments including legal, strategic estates, capital projects, ICT, planning and highways and transportation are available. <b>Q4 2022/23</b></li> <li>Prioritise population data development to underpin accurate projections and forecasts for existing resident populations and to support effective s106 negotiations going forward. <b>Ongoing</b></li> <li>Ensure consistent monitoring and reporting of all risks to Schools Programme Board. <b>Ongoing</b></li> <li>Continue to move forward with digital projects to support distance and mobile learning and embed into a long term and sustainable model. <b>Ongoing</b></li> <li>Starting to develop the WESP for the Council to meet the policy requirements. <b>Ongoing</b></li> </ul>										
Potential Impact(s)	Linked Risks		Key Indicators / Measures used to monitor the risk										
<ul style="list-style-type: none"> <li>Opportunities to enhance the school estate, and transform education will be missed</li> <li>Insufficient secondary places in some central and north east areas of the city</li> <li>Insufficient places in ALN settings across the city, leading to costly placement in out of county &amp; private settings</li> <li>School buildings that are not suitable for teaching and learning</li> <li>Further degeneration of school buildings &amp; rise in asset management backlog</li> <li>Project cost and time overruns</li> <li>Risk that school ICT infrastructure fails in the short to medium term and does not support the new curriculum</li> <li>Risk that in the current situation, learners do not have access to ICT equipment to support distance learning</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> <li>Health and Wellbeing</li> <li>Sustainability</li> </ul>		<ul style="list-style-type: none"> <li>Spend against the asset programme in financial year, in accordance with the responsibilities of schools and corporate landlord (Corporate Plan)..</li> <li>Timelines to deliver projects within the SOP programme.</li> <li>New key performance measures which are being developed as part of the overarching SOP Strategy.</li> </ul>										
Type(s) of Impact													
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Social</li> </ul>													

## Education - Schools' Delegated Budgets

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)											
<p>The number of schools with deficit budgets and/or the overall value of deficit budgets increases, or that those schools (particularly in the Secondary sector) with existing deficit budgets do not deliver agreed deficit recovery plans.</p>	<p style="text-align: center;">Impact</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Last Reviewed</td> <td>Q2 2022/23</td> </tr> <tr> <td style="width: 50%;">Last Revision</td> <td>Q2 2022/23</td> </tr> </table>	Last Reviewed	Q2 2022/23	Last Revision	Q2 2022/23	<p style="text-align: center;">Impact</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<p style="text-align: center;">Impact</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Target Reduction Date</td> <td>Q4 2022/23</td> </tr> </table>	Target Reduction Date	Q4 2022/23	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center; vertical-align: middle;"> <b>Mel Godfrey</b> (Neil Hardee)                 </td> <td style="width: 50%; text-align: center; vertical-align: middle;"> <b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills                 </td> </tr> </table>		<b>Mel Godfrey</b> (Neil Hardee)	<b>Councillor Sarah Merry</b> Deputy Leader & Education, Employment & Skills
Last Reviewed	Q2 2022/23														
Last Revision	Q2 2022/23														
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Target Reduction Date	Q4 2022/23														
<b>Mel Godfrey</b> (Neil Hardee)	<b>Councillor Sarah Merry</b> Deputy Leader & Education, Employment & Skills														
<b>Potential Impact(s)</b>	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>											
<ul style="list-style-type: none"> <li>An overall deficit arising from schools budgets would count against the funding available for the Council</li> <li>Schools with deficit budgets may struggle to adequately fund the resources required to achieve the desired levels of educational attainment</li> <li>Schools with deficit budgets may struggle to adequately fund maintenance of school buildings creating an issue for other budgets, eg Capital/SOP Band B</li> <li>Schools that continually fail to address deficit budgets may ultimately require LA intervention, with a corresponding increase required in centralised resources</li> </ul>	<ul style="list-style-type: none"> <li>As at 31st March 2022, two schools have a deficit balance. Both schools have long term plans to emerge from deficit. For the 2022/23 financial year, four schools applied to set deficit budgets.</li> <li>The Education Directorate receives regular detailed budget monitoring reports from the LA Financial Services team and manages its budgets within the parameters set by the LA.</li> <li>There is good engagement with schools on financial issues through the well established School Budget Forum arrangements with all papers and meeting agenda and minutes made available on the Council's website.</li> <li>There is an agreed protocol for dealing with schools in deficit and the LA has agreed local parameters for managing schools surplus balances. These were temporarily amended at the end of the 2020/21 financial year to take account of the increased level of balances following the distribution of grants from Welsh Government in March 2021.</li> <li>Officers from Education and Financial Services work with individual schools through Headteachers and Governing Bodies to formulate Medium Term Financial Plans (MTFP) to seek to either balance individual school deficits within four financial years or to ensure that the accumulated deficits were frozen or slowed as much as possible.</li> <li>Officers continue to monitor and challenge those schools in deficit before allowing any additional financial commitments, both staffing and other expenditure.</li> <li>For each school in deficit, the Council has identified a monitoring officer to provide an independent challenge to the school. This is in addition to the LFM Officer currently supporting that school.</li> <li>Financial position of schools as at Q1 is improved; there is a reduction in number of schools with a deficit, ; however the levels of schools with surplus balances has increased.</li> </ul>			<p>There has been a significant reduction in the number of schools with deficit budgets. This is currently two schools. The Directorate will:</p> <ul style="list-style-type: none"> <li>Continue to work with schools in a deficit. Q4 2022/23</li> <li>Continue to monitor all schools and particularly those at risk of entering a deficit position.</li> <li>Further work has been started in Q2 to project balances for each school for the end of the 22/23 financial year to include the potential impact of pay awards and increased energy costs. This will then inform the overall strategy for school balances in 2022/23</li> </ul>											
<b>Type(s) of Impact</b>	<b>Linked Risks</b>		<b>Key Indicators / Measures used to monitor the risk</b>												
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<p>Linked risk to Covid 19 issues particularly with regard to decrease in income, impact on grants and inability to manage staffing changes.</p>		<ul style="list-style-type: none"> <li>School budget monitoring position</li> <li>Number of schools setting deficit budgets</li> <li>Final budget balances</li> </ul>												

## Education - School Improvement & Attainment

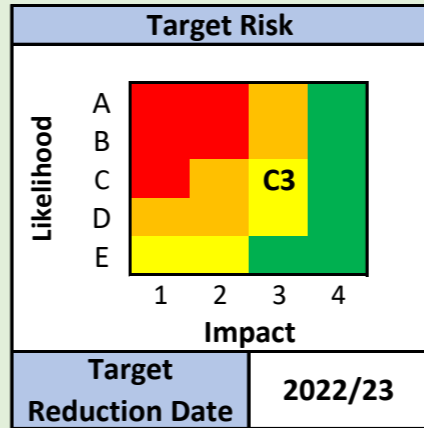
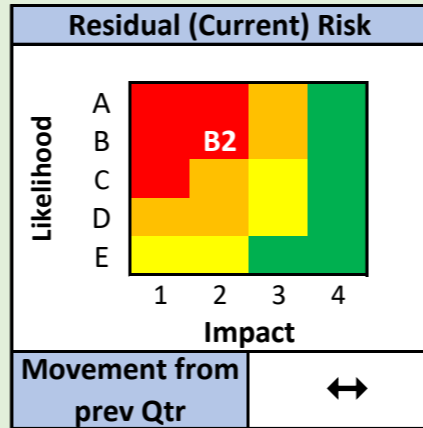
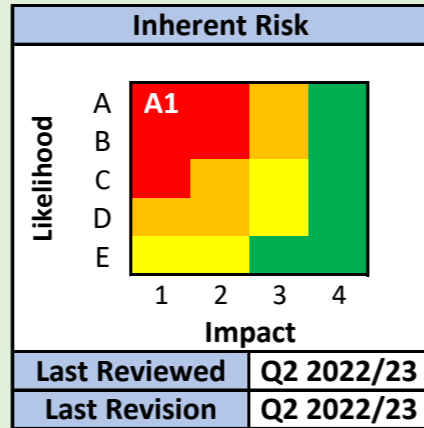
Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>The risk that school improvement is not delivered as planned, in light of changing accountability and assessment arrangements and National Reforms (Curriculum and Additional Learning Needs).</p>				<p><b>Mel Godfrey</b> (Mike Tate)</p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Last Reviewed</td> <td>Q2 2022/23</td> </tr> <tr> <td>Last Revision</td> <td>Q1 2022/23</td> </tr> </table>	Last Reviewed	Q2 2022/23	Last Revision	Q1 2022/23	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Target Reduction Date</td> <td>Q4 2022/23</td> </tr> </table>	Target Reduction Date	Q4 2022/23		
Last Reviewed	Q2 2022/23												
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Movement from prev Qtr	↔												
Target Reduction Date	Q4 2022/23												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>Education and Lifelong Learning is supporting schools across the city in returning 'back to normal' operations where possible, moving forward with the new processes that have been embedded over the past two years. The LA is providing continued support to schools to ensure that pupils sitting summer exams have the best possible environment to achieve their best.</li> <li>The LA and CSC are supporting schools to prepare to introduce Curriculum for Wales 2022. There is flexibility in implementing the curriculum considering challenges faced as we continue to manage the pandemic and with ongoing operational issues faced by schools.</li> <li>Estyn concluded in their full inspection of Cardiff Education Services in February 2022 that there has been a sustained and incremental improvement in Cardiff Education in recent years. Inspection outcomes are strong, especially in the primary sector. Outcomes for outcomes for pupils across key stage 4 have been above or well above expectations in the majority of schools in the three years up to the pandemic. Outcomes for pupils that are eligible for free-school meals (efsm) has generally been above that of the same group nationally.</li> <li>Estyn noted that the LA has established strong working relationships with the regional consortium and there are robust processes for the support and challenge to schools causing concern.</li> <li>School inspections resumed in Q4, with a number already under way, these include school inspections that were delayed as a result of COVID-19, with additional schools scheduled for May and June of this year.</li> </ul>			<ul style="list-style-type: none"> <li>Following the November '21 Inspection, Estyn recommended that the LA ensures that the work of the regional consortium (CSC) is focused appropriately on Cardiff's strategic priorities. Actions to align the work of the LA and CSC more closely will be carried forward into the new Directorate Delivery Plan. <b>Q4 2022/23</b></li> <li>Closely monitor school exclusions and school attendance, paying particular attention to investigating alternatives to exclusions on a case-by-case basis; also by providing further support to families as well as making sure they are more involved in the process. <b>ONGOING</b></li> <li>Work with CSC to provide support to schools to develop teaching and learning approaches in line with Curriculum for Wales 2022 and prepare for new assessment arrangements. <b>ONGOING</b></li> <li>Continue to support schools to prepare for ALN Reform including developing effective systems for quality assuring IDPs and IDP reviews. <b>Q4 2022/23</b></li> <li>Enhance processes for All Schools Risk monitoring and Schools Causing Concern. <b>Q3 2022/23</b></li> <li>Develop the Team Around the School approach, which is currently being piloted in the East and West of the city, to ensure that integrated support is offered to schools where there are specific concerns. <b>Q4 2022/23</b></li> </ul>									
<b>Potential Impact(s)</b> <ul style="list-style-type: none"> <li>Learners do not reach their full potential</li> <li>Schools are not supported to improve</li> <li>Schools are not able to deliver the new curriculum</li> <li>Impact on Estyn judgements</li> <li>Value for money - CSC</li> </ul>													
<b>Type(s) of Impact</b> <ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<b>Linked Risks</b>		<b>Key Indicators / Measures used to monitor the risk</b>										
			KS4 2018/19 School Performance, Outcomes from Estyn Inspections up to 2020.										



# Air Quality & Clean Air Strategy

**Description**

Air quality in Cardiff does not meet statutory requirements set by legislation and continues to have a detrimental impact on health for residents and visitors to Cardiff.



**Risk Owner(s)**

**Andrew Gregory**  
(Jason Bale)

**Councillor Caro Wild**  
Climate Change

**What we've done/are currently doing to achieve the Residual Risk Rating**

RESIDUAL RISK RATING AFTER CURRENT CONTROLS BELOW - B2 = LIKELY/ SIGNIFICANT

Monitoring

- Non-automatic nitrogen dioxide (NO<sub>2</sub>) monitoring sites at 136 locations.
- Data includes monitoring at schools as part of the TRO pilot projects at schools
- There are three live 24/7 monitoring stations:
  - Cardiff Frederick Street: measuring levels of NO<sub>2</sub>, PM10 & PM2.5, SO<sub>2</sub>, CO and O<sub>3</sub>
  - Richard's Terrace, Newport Road: measuring levels of NO<sub>2</sub> & PM10
  - Castle Street measuring levels of NO<sub>2</sub> PM10 and PM2.5
- 7 near real time indicative automatic analysers located predominantly in Cardiff's City Centre (5), one in Llandaff within the established AQMA and one in Canton on Landowne Road. These sites measure on a 24/7 basis, continuously monitoring for Nitric Oxide, Nitrogen Dioxide, Ozone, PM10 & PM2.5, and does so every 15 minutes
- Order raised with Vortex to install up to 46 indicative low cost sensors – this has been funded through One Planet Cardiff.

Air Quality Management Areas (AQMA's)

- Cardiff has 4 existing declared Air Quality Management Areas (AQMA's) all as a result of elevated NO<sub>2</sub> concentrations from road traffic emissions.

Clean Air Plan

- Provisional monitoring results for Castle Street showed annual average for Castle Street was 26 µg/m<sup>3</sup> for NO<sub>2</sub> for 2021. However this includes closure period between Jan-October.
- Interim Castle Street Option now implemented and general traffic returned from Nov. Ongoing assessment of results from Nov and Dec.
- Results from January -March indicate 3 month average of 36 µg/m<sup>3</sup> for NO<sub>2</sub>. when annualised in comparison to 2018/2019 results, this reduces to 35µg/m<sup>3</sup>.
- Ongoing monitoring of results will continue with potential more detailed assessment undertaken to provide more robust annualisation of results, as agreed with WG.
- Mitigation measures to be detailed to WG if annualised results exceed agreed two threshold values of 35 µg/m<sup>3</sup> and 38 µg/m<sup>3</sup>.
- Construction of Ph1 City Centre West scheme (Wood St & Central Square) – ongoing
- Completion of Bus Retrofitting Programme of 49 buses – buses have been fitted with exhaust technology which reduces NO<sub>x</sub> emissions from the buses by 90%
- All 36 EV buses launched early January
- Ongoing discussions with WG on Castle Street Options in terms of agreement for permanent option and timescales/ funding to do so.

Taxi Scheme

- T&Cs for Grant Scheme signed off and submitted for political approval for launch in addition to the a further Euro 6 scheme funded directly by Cardiff Council.
- 5 WAV EV taxis - Concession agreement contract with Days Hire Limited to facilitate leasing of vehicles. Welsh Gov has agreed to establish a T&F group to assess how better the taxi lease scheme can be taken up due to failure of uptake.

Clean Air Strategy and Action Plan - A wider Clean Air Strategy and Action Plan has been developed to satisfy the requirements of LAQM. The strategy includes measures that will likely provide further AQ improvements including AQMAs.

Behavioural Change & Mode Shift Programme - The Clean Air Strategy and Action Plan which was appended to the final Clean Air Plan, outlined some initial high level actions aimed at influencing transportation behavioural change with focus on but not limited to;

- Providing technical scientific evidence on the Council's website and the Welsh Air Quality Forum websites;
- Promoting air quality and engaging with government and business audiences through seminars, social media and conferences;
- Communicating with the public about how to reduce the impacts of air pollution by travelling using alternatives to the private car, particularly on days when air quality is poor.
- Working with Welsh Government and other partners to integrate information about air quality into educational resources for to young people; and
- Improving the air quality information that the Council can provide by increasing our ability to undertake real-time air quality monitoring.

**What we plan to do to meet target**

TARGET RISK RATING AFTER ACTIONS BELOW - C3 = POSSIBLE/ MODERATE

Implement Clean Air Plan

- Package of measures as detailed in Final Plan:
- Vortex sensors - final positions to be agreed and installation programmed for Q1/Q2 2022
- Ongoing monitoring and assessment of AQ levels (Ongoing)
- Completion of Wood St/ Central Square scheme - Q3 22/23
- Taxi scheme launch subject to political approval - Q2 22/23 - TBC
- Further assessment on Castle Street to undertake more detailed modelling on revised scheme - ongoing dialogue with WG re timescales with proposed dates set out as follows:
  - October 2022 – 12 months from introduction of current scheme – completion of data collection and further modelling post COVID -19
  - Jan 2023 Completion of data/modelling assessment, identification of preferred option and production of a Cabinet Report for decision.
  - May 2023 Complete the tender process and New Cabinet Paper (to award Tender)
  - June 2023 On site (with the road closed - this will be achieving compliance)
  - June 2024 Castle St scheme completed
  - Finalisation of Monitoring Plan and agreed mitigation measures if Target Values are exceeded on annualised data.

Clean Air Strategy and Action Plan

- Roll out of measures (subject to grant bids/ funding)
  - Pilot project Non Idling Zones – Work with WG and Active travel team on potential, targeted around schools – Q2-Q3 2022/23
  - Living Walls and other Green Infrastructure – Q1-Q4 2022/23 ongoing work with two new Green Wall Projects in conjunction with colleagues in Parks -Ysgol Mynydd Bychan and Birchgrove Primary Green wall project. This is in addition to ongoing monitoring of two other green wall projects at Kitchener Primary School and Dusty Forge Centre.
  - Progression of EV Infrastructure - Q2-Q4 2022/23
  - Update Air Quality Planning Guidance
  - Schools Active Travel - Q1-Q4 2022/23 continued support on TRO projects and expansion of project.
  - Behavioural Change Promotion, Car Free Day - Consideration of an event for Car Free day September 22 and for future Clean Air Days Consolidation of a dedicated Behavioural Change Programme linked to the Behavioural Change Strategy to be developed for One Planet Cardiff. (Ongoing)
- As part of the Corporate Plan PTE has given a commitment in collaboration with Shared Regulatory Services, to review the existing Clean Air Strategy and Action Plan in 2022/23. As part of this work, it will be prudent to review the specific section on Behavioural Change and in doing so it would be an opportune time to develop a more robust and dedicated Behavioural Change Programme.

It should be noted that the Clean Air Strategy and Action Plan/ Clean Air Plan predated the development/ launch of One Planet Cardiff. One of the underlying actions within One Planet Cardiff relates to a City-Wide Behaviour Change Strategy. On this basis consideration should be made to consolidate the remaining aspects of this work into the wider One Planet Behaviour Change Strategy, particularly where action relating to behaviours for travel/ transportation are being considered, as carbon reduction benefits will also provide clean air benefits as has already been detailed in the One Planet Strategy. The Clean Air Strategy and Action Plan could then be updated to reflect this work and carry forward relevant actions relating to air quality. Officers will discuss these steps with the Cabinet Member for Climate Change and where necessary seek Cabinet approval on an updated Behavioural Change Strategy

**Potential Impact(s)**

**Health & Safety**

- No improvement to health
- Increased burden on health care
- Further deterioration of related health conditions

**Legal & Regulatory / Financial**

- Breach of legal / statutory requirements
- Potential significant financial penalty

**Type(s) of Impact**

- Health
- Regulatory
- Financial
- Strategic
- Reputational

**Linked Risks**

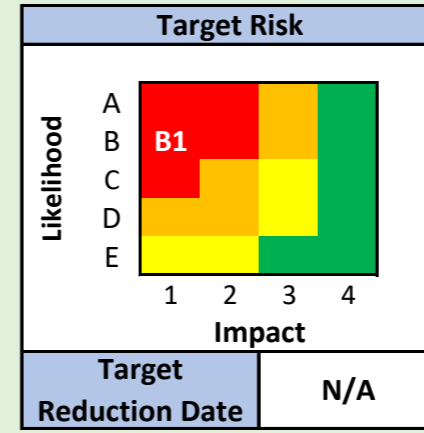
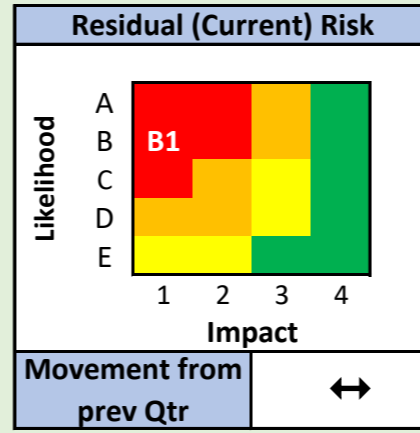
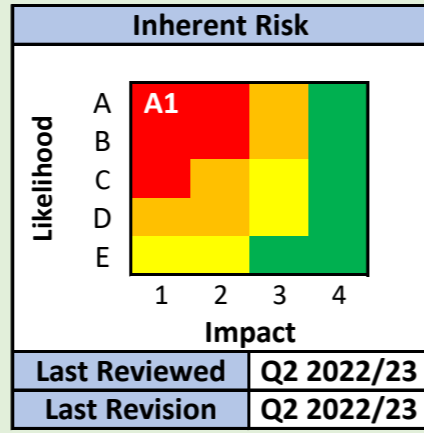
**Key Indicators / Measures used to monitor the risk**

- Implementation Plan for measures (funding dependent)
- Monitoring and Evaluation Plan for Clean Air Plan
- Ongoing monitoring and reporting under LAQM

# City Security

**Description**

Major security-related incident in 'crowded places' as a result of international or domestic terrorism.



**Risk Owner(s)**

Chris Lee  
(Gavin Macho)

Andrew Gregory

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- All existing identified high-risk, crowded places have been formally assessed
- Some crowded places have an extremely limited and in some cases 'third party managed' access control process to operate them; providing little/no challenge
- CONTEST Protect/Prepare Task & Finish Group maintains the City Gateways Public Realm Enhancement Scheme, with agreed options for suitable PAS 68/69 mitigation for appropriate boundary locations; referred to as 'gateways'
- The work done in the city to address security concerns has been predominantly focused on the provision of physical assets to mitigate against the threat of hostile vehicles
- Areas protected against the threat of hostile vehicles include the Principality Stadium, St Mary Street, Queen Street, St David's Dewi Sant and Cardiff Bay.
- The Cardiff City Centre Access Control Protocol is currently operating at the heightened response level, reflecting the UK National Threat Level; permitting vehicles onto the pedestrianised areas within Cardiff City Centre using strict parameters
- The Cardiff PSPG is chaired by the Chief Executive and meets every 3 months. It has commissioned a major strategic review of all City Centre Security matters with reference to how existing arrangements will fit into the new developments coming online. A Cardiff Infrastructure Report, how we currently manage security infrastructure in the city centre, has been put together. This includes recommendations/ prioritising interventions, as well as input and feedback from key stakeholders. A summary of the report was presented at the PSPG meeting in January 2022. This led to a Strategic oversight meeting and that in turn has led to a meeting with Senior Welsh Government to discuss potential funding methods.
- In the Queen's speech delivered this month, May 2022, it was announced that the CONTEST Act would be going through Parliament. This will create a statutory duty for Counter Terrorism preparedness to be undertaken across all City Centres across the UK. Cardiff Council along with the Counter Terror Police Wales or CTPW, FOR Cardiff and Cardiff Council City Centre Management have formed a security partnership which will be driving the adoption of the outcome of the Protect Act.
- Security Partnership delivered an awareness event for City Centre Partners to introduce Protect Act and in Q2, agreed to manage the Protect roll out in the City Centre via a Business model based on activity rather than geographical area. In this way specific ways of operating can be developed for each area rather than generic models

**What we plan to do to meet target**

- The PSPG Chair has commissioned a Director led review across all relevant Service areas to assess current operational and tactical arrangements for City Security to see if they are effective. All opportunities for improvement to be captured and costed. **ONGOING**
- The PSPG is broadening its remit by taking on a more comprehensive portfolio of security issues inclusive of Cyber Security, Insider threat and personal security. Training and development being planned, projects managed at director level. **ONGOING**
- Consideration to be given to incorporating structured and strategic conversations about security and counter terrorism into pre application stage of major developments. **ONGOING**
- The PSPG will try to engage with Government to find funding to improve and develop Cardiff's security arrangement. Shovel ready projects ready to go. **ONGOING**
- Q3** With the Security Partnership, information and materials will be produced for City Centre Partners. **Q4** The Security Partnership will develop training and awareness products for City Centre Partners.

**Potential Impact(s)**

**Immediate / Short-Term**

- Large numbers of fatalities, injuries to public
- Extensive structural damage and/or collapse of buildings
- Closure of roads having impact on transport network and access to businesses and properties.
- Damage/disruption to utilities (gas, electricity, water etc.)
- Immediate impact to core business, retail and sporting district in the centre of Cardiff

**Ongoing / Longer Term**

- Reputational risk due to a public perception Cardiff is an unsafe place
- Area viewed as a risk for potential future business investment.
- Inability to attract major future national and international events (political, sporting etc.)
- Increase in demand for Council services/support for all affected.
- Current economic climate to reduce the effectiveness of any recovery/regeneration of the area.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
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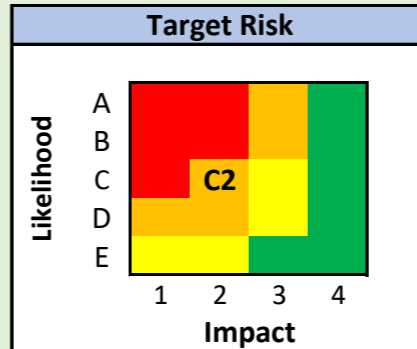
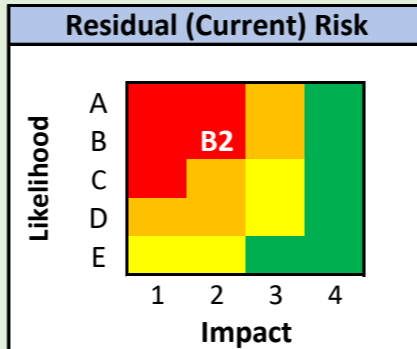
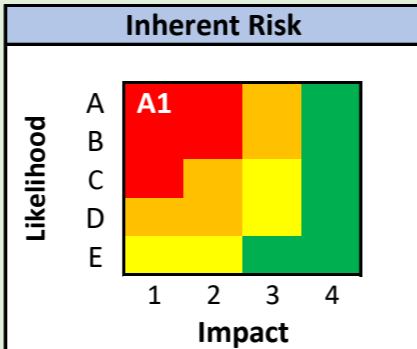
**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

- National Threat Level and period at level
- No of 'Crowded Places' not protected to PAS 68/69 level

# Climate Change & Energy Security

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.



**Risk Owner(s)**

**Andrew Gregory**

**Councillor Caro Wild**  
Climate Change

Last Reviewed Q1 2022/23  
Last Revision Q1 2022/23

Movement from prev Qtr ↔

Target Reduction Date 2022/23

**Potential Impact(s)**

- Flood & Storm**
- Loss of life and risk to life
  - Direct damage to property, utilities and critical infrastructure
  - Blight of Land and Development
  - Disruption to service delivery
  - Contamination and disease from flood and sewer water and flood on contaminated land
  - Increase in health issues
  - Break up of community and social cohesion
  - Increase cost of insurance
  - Migration of ecosystems
  - Inconsistent energy supply
  - Increased costs
  - Inability to deliver public services
  - Decrease in economic output
  - Disruption to the supply of utilities
  - Increased fuel poverty

**What we've done/are currently doing to achieve the Residual Risk Rating**

The Council has declared a Climate Emergency and instigated a One Planet Cardiff Strategy as its strategic response to this.

The following specific risk areas have been identified:

- COASTAL EROSION (see separate tab for details)
- FLOODING
- EXTREME WEATHER
- ENERGY SECURITY & DECARBONISATION
- BIODIVERSITY

**What we plan to do to meet target**

- Develop strategic response to the Climate Emergency Declaration to incorporate carbon neutral target.
- See separate tabs for details
- COASTAL EROSION
- FLOODING
- EXTREME WEATHER
- ENERGY SECURITY & DECARBONISATION
- BIODIVERSITY

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Health & Safety
- Partnership
- Community & Environment
- Stakeholder

**Linked Risks**

Coastal Erosion  
Air Quality  
Business Continuity

**Linked Documents**

<https://www.evaccardiff.co.uk/>  
<https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

Storm Events that meet silver & gold emergency intervention  
Annual number of flooded properties and severity (statutory reporting)  
Energy use / renewable energy production of Cardiff Council

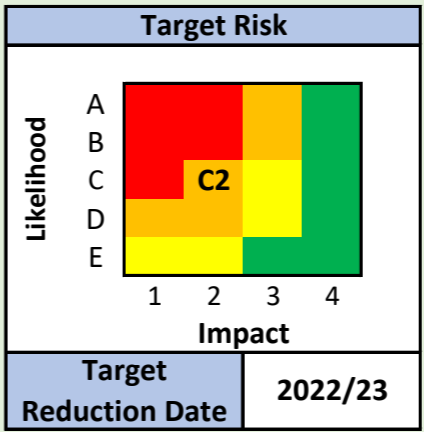
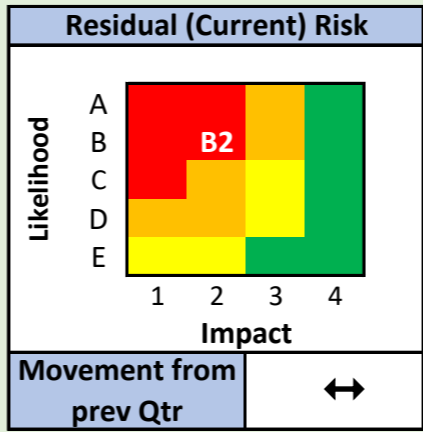
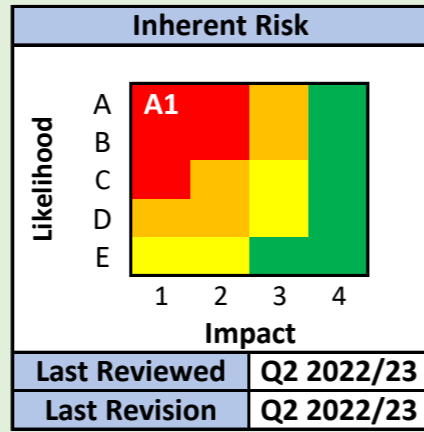
# Climate Change - Biodiversity

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

**Potential Impact(s)**

- Loss of biodiversity leads to reduction in ecosystem resilience, and reduction in ecosystem resilience will compromise the provision of ecosystem services. These are the services or benefits which we gain from the natural environment.
- Ecosystem services include climate change mitigation and adaptation.
- Climate change mitigation includes the sequestration and storage of carbon by plants, especially long-lived species such as trees. Reduction of this ecosystem service makes it harder to reduce net carbon emissions. Annually Cardiff's trees (not including other aspects of green infrastructure) provide ecosystem services worth £3.31 million, of which £1.9 million is in carbon storage and sequestration (iTree Study, Sept 2018).
- Climate change adaptation services include storm water attenuation by vegetation and reduction of surface water volume through evapotranspiration
- Trees, green walls and green roofs allow cooling and shading, thereby mitigating the urban heat island effect which may become more prevalent with a warmer climate.
- Hotter summers also increase risk of aerial pollution through air stagnation, and green infrastructure can remove certain pollutants from the air as well as having a cooling effect.
- The National Priorities of the WG Natural Resources Policy include 'Delivering Nature-based Solutions'. Failure to ensure protection of biodiversity and ecosystem resilience risks failure to deliver these nature-based solutions, which include climate change mitigation and adaptation.

- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Legal
  - Financial
  - Health & Safety
  - Partnership
  - Community & Environment
  - Stakeholder



**Risk Owner(s)**

**Andrew Gregory**  
(Simon Gilbert/ Jon Maidment)

**Councillor Caro Wild**  
Climate Change

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Cabinet Report of 14/10/21 Recommended the Council sign the Edinburgh Declaration.
- Developed a Biodiversity and Resilience of Ecosystems Duty Forward Plan, to implement the statutory duty to seek to maintain and enhance biodiversity and in doing so to promote ecosystem resilience.
- Undertaken an 'iTree-Eco' study to look at the value of trees in terms of the ecosystem services that they provide.
- Working with neighbouring Local Authorities through the Local Nature Partnership Cymru project to share ideas and best practise for enhancing biodiversity across the City and identifying opportunities for cross-boundary projects to improve habitat and species connectivity and increase ecosystem resilience.
- Contributed to the Central South Wales Area Statement recently published by Natural Resources Wales.
- In September 2021 the Council agreed the Vision, Issues and Objectives for the new LDP.

Objective 10 is: "To ensure the resilience of ecosystems by protecting and enhancing Cardiff's Green and blue Infrastructure, its biodiversity and other natural assets."

- The Coed Caerdydd Project has also resulted in further officer resource to support volunteer activity relating to tree planting and maintenance / aftercare and whereby grant funding has enabled the appointment of a Volunteer Co-ordinator on a fixed term contract up until July 2023.
- Funding secured for addition Grade 9 Principal Planner Ecologist/Green Infrastructure post in the Planning Service. However, recruitment of replacement G7 Planner (Ecology) failed to find suitable candidates in Q4 2021/22.
- External Consultants appointed temporarily to provide expert ecological advice for planning applications as an interim measure to deliver regulatory planning functions
- Further funding has been obtained which has resulted in the LNP Co-ordinator post being extended at full time hours up until 31/3/23. This funding has also enabled the creation of a temporary Community Ranger Post until 31/3/23 to assist with the delivery of Local Places for Nature funded Projects.

**What we plan to do to meet target**

- Review the Cardiff Local Development Plan including review of Designations and updated Habitat Regulations Assessment - Q3 2022/23
- Develop an enhanced tree planting programme for 2022/23 with the inclusion of land in private ownership - Q3 22/23 (10th October)
- Update the Cardiff Biodiversity and Resilience of Ecosystems Duty Forward Plan, including the Action Plan, in 2022 in line with legislative requirements - Q4 2022/23
- Recruitment of Principal Ecologist and vacant Planner (ecology) post - Q3 2022/23
- Officer attendance at all Wales Planning and Diversity Forum - Q1, Q2, Q3, Q4 2022/23
- Regular meetings of Council "Green Infrastructure Officer Group" including colleagues from Planning, Parks, Drainage, and Public Rights of Way - ONGOING
- Seek opportunities for partnership working under the 5 main themes of the South Wales Area Statement (building resilient ecosystems, working with water, connecting people with nature, improving our health, improving our air quality). - Q4 2022/23
- Develop the local Nature Recovery Action Plan through the Local Nature Partnership (LNP) - Q4 2022/23
- Discussions between the Council, Welsh Government and the Wales Council for Voluntary Action concerning LNP grant funding for a further 2 years is ongoing. - Q4 2022/23

- Linked Risks**
- Coastal Erosion
  - Air Quality
  - Business Continuity
  - Energy decarbonisation

- Linked Documents**
- <https://www.evaccardiff.co.uk/>
  - <https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

Extent of Green Infrastructure in the City.

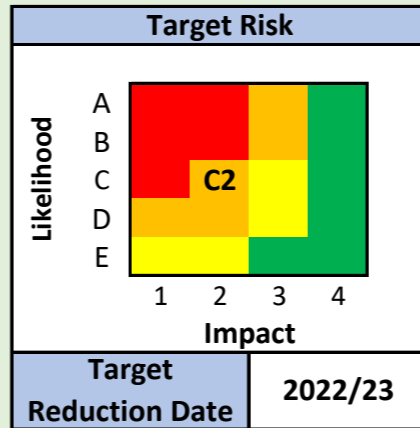
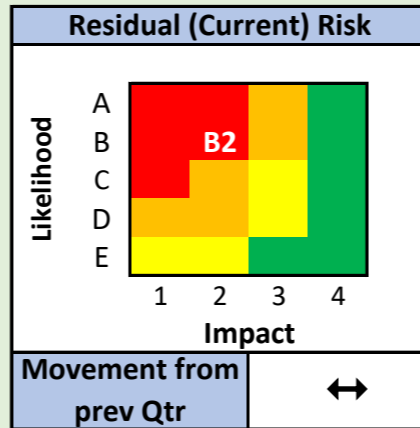
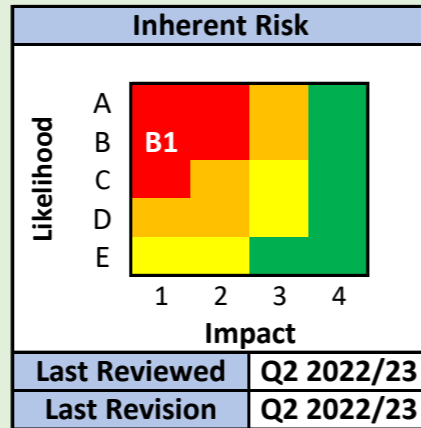
# Climate Change - Energy Security & Decarbonisation

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

**Potential Impact(s)**

- Energy security (energy efficiency & decarbonisation of supply)**
- Inconsistent energy supply
  - Increased costs
  - Inability to deliver public services
  - Decrease in economic output
  - Disruption to the supply of utilities
  - Increased transport costs
  - Increased costs for heating / providing services to buildings
  - Increased fuel poverty

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**Risk Owner(s)**

**Andrew Gregory**  
(Gareth Harcombe/ Liz Lambert)

**Councillor Caro Wild**  
Climate Change

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Energy security (energy efficiency & decarbonisation of supply)**
- Climate Emergency Declared by Council
  - Council approved the final "One Planet Cardiff" Strategy on October 14th 2021 which addresses the Climate emergency and sets a pathway to a carbon neutral Council by 2030.
  - Established internal and external partnership and governance boards to steer our response to the climate emergency.
  - Energy efficiency measures being installed through Re-Fit and Salix projects - Now managed by FM
  - Phase 2 of Re-Fit project finalised and going through due diligence with Salix funding organisations - Schools focus for this tranche
  - NPS Consortium approach to purchasing energy to secure best prices - continuing by Economic Development
  - Lamby Way solar farm complete including the private wire connection to the Welsh Water Waste Treatment Works.
  - District Heat Network - Construction commenced on site in Jan 22 with a 3 year programme to completion
  - Carbon baselining and impact modelling reported to Welsh Govt and included in One Planet Cardiff. This has been used to inform the priorities in the action plan and progress will be monitored and reported annually.
  - Scoping additional carbon reduction projects for future action as part of the One Planet Cardiff project with key target areas confirmed in the One Planet Cardiff Action Plan
  - Delivering Low Emission Transport Strategy - approved April 2018 and implementation of action plan underway:
    - first tranche of residential chargers delivered, and second tranche now finalised
    - WG funding secured to install EV chargers at council buildings for small fleet vehicles
    - ULEVTF funding secured to install charging infrastructure in car parks and additional in-year funding awarded to implement Rapid charging infrastructure at Lamby Way depot for 12 electric refuse collection vehicles, and to engage consultant/ specialist to scope/design & specification for renewable connection & switch gear to produce green energy from landfill gas and/or the solar farm.
  - Working with the Cardiff City Region to develop a new domestic retrofit grant scheme using Energy Company Obligation funding. Plans for a major energy retrofit of council owned low-rise domestic blocks also in preparation and Welsh Government ARBED grant funding being targetted at "Hard to Treat" steel framed properties for implementation later this year.
  - OPC commits to a long term strategy for public engagement and behaviour change to build public resilience and positive action through advice and guidance and based on best practice and observed impact of initiatives elsewhere. This work is guided by advice from the Centre for Climate Change & Social Transformations (CAST) .

**What we plan to do to meet target**

- Energy security (energy efficiency & decarbonisation of supply)**
- Implement and monitor the One Planet Cardiff Strategy with carbon reduction targets and associated action plan for delivery over the to 2030 - Overall target March 2030 with specific project based targets stated in the detailed action plan **ONGOING**
  - Implement "Mission Statements" to secure low/zero carbon development and retrofit in the Council's Estate - (Strategic Estates/ Schools/ Housing) by **2024**
  - Promote and implement the approved policy position to guide new private sector development in the city - Ongoing - Relates to the Planning/development control process **ONGOING**
  - Complete Phase 1 of the Cardiff District Heat Network – by **Q4 2023/24**
  - Develop a pipeline of new renewable generation assets for cabinet approval in 22/23 - by **Q4 2022/23**
  - Seek ways to accelerate housing energy efficiency and retrofit schemes across the city and possibly the region as part of the One Planet Cardiff project - Develop options and a position paper by **Q4 2022/23**
  - Electric Vehicle strategy - Proposals to convert council fleet to electric being reviewed/ assessed to allow for impact of Covid-19 and changes to requirements/ working practices **ONGOING**
  - Integrate sustainable travel and energy efficiency thinking into the new proposals for Hybrid Working - Hybrid working policy expected by **Q4 2022/23** (Economic Development lead)

**Type(s) of Impact**

- |                    |                           |
|--------------------|---------------------------|
| • Service Delivery | • Health & Safety         |
| • Reputational     | • Partnership             |
| • Legal            | • Community & Environment |
| • Financial        | • Stakeholder             |

**Linked Risks**

- Coastal Erosion
- Air Quality
- Business Continuity

**Linked Documents**

- <https://www.evaccardiff.co.uk/>
- <https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

Energy use / renewable energy production of Cardiff Council

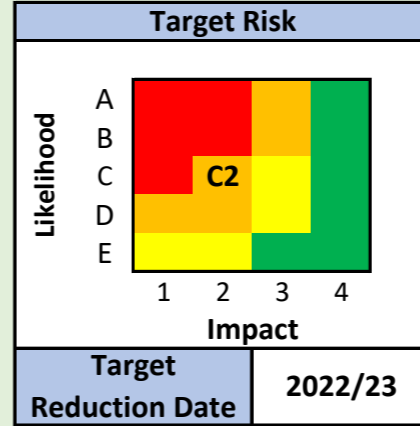
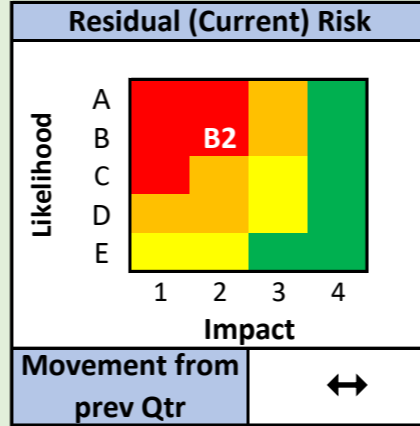
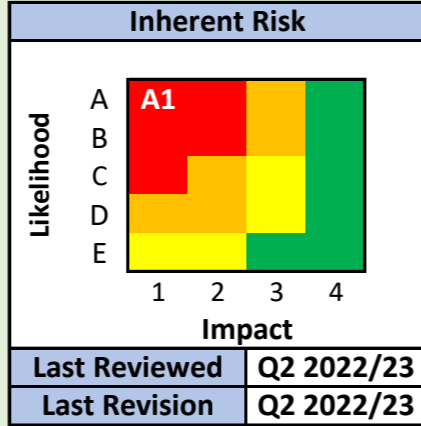
# Climate Change - Extreme Weather

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

**Potential Impact(s)**

- Loss of life and risk to life
- Damage to infrastructure & utilities
- Service delivery
- Increase in health related issues including air quality
- Blight of development
- Migration of ecosystems

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**Risk Owner(s)**

<b>Andrew Gregory</b> (EMU/Gary Brown)	<b>Councillor Caro Wild</b> Climate Change
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**What we've done/are currently doing to achieve the Residual Risk Rating**

**The Council has declared a Climate Emergency**

**Extreme Heat**

- Working with Partners in the LRF to warn them of anticipated heatwave impacts upon vulnerable groups and support response to such a risk
- Supporting the enhancement of the public's own resilience through advice and guidance available from the EVAC Cardiff Website

**Extreme Cold/ Snow**

- Implementation of Council's Cold Weather Response Plans
- Winter Service review undertaken to consider the potential impact of Covid-19:
  - concentration made to build resilience into Winter Service as high risk to staff resource due to illness and the requirements of isolation
  - required training and staff rotas put in place, however there is a limited available resource with the required skillsets within the authority
  - investigations into feasibility/ availability of external assistance
  - Winter Service 21/22 delivered in line with statutory requirements

**What we plan to do to meet target**

**Extreme Heat**

- Develop a 20 year heat mitigation strategy for the city. Working with partner agencies and commercial stakeholders to support development of heat reduction programmes.- **2023/24**
- Engage with Welsh Government with in WLGA, and PSB to ensure consistent support in managing this risk ensuring the planning process works for all stakeholders to ensure we develop sustainable planning strategy's for future developments, planning the management of this risk (WG Technical Advice Note (TAN) 15) - a new updated Technical Advice Note TAN 15 is due to be published in **June 2023**

**Extreme Cold/ Snow**

- Investigate further whether external assistance can be utilised/is available to build future resilience - risk remains for disruption to the service next winter if the current pandemic continues/ other new external factors emerge - **2023/24**

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>
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**Linked Risks**

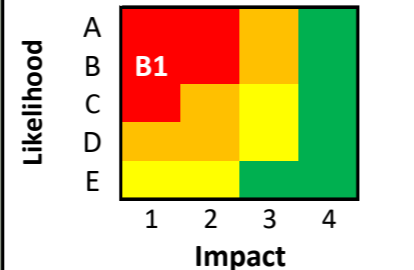
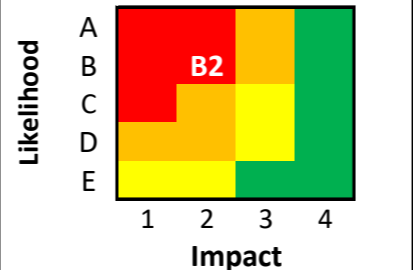
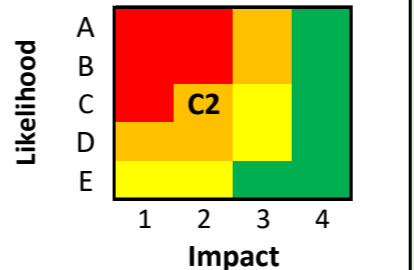
Coastal Erosion  
Air Quality  
Business Continuity

**Linked Documents**

<https://www.evaccardiff.co.uk/>  
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**Key Indicators / Measures used to monitor the risk**

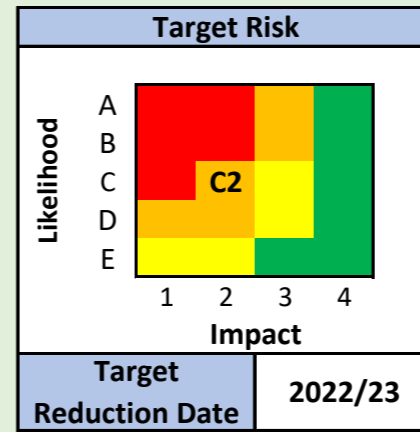
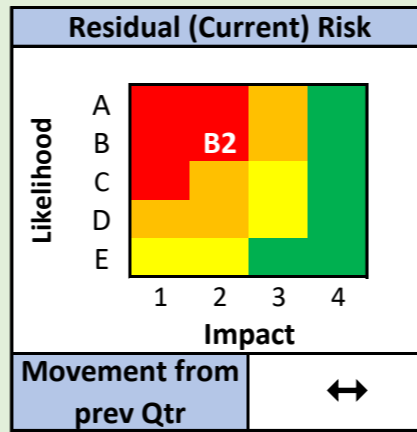
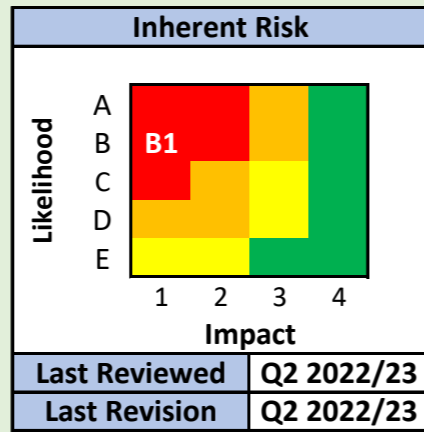
# Climate Change - Flooding

Description		Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)		
<p>Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.</p>					<p style="text-align: center;"><b>Andrew Gregory</b> (Gary Brown/ Simon Dooley Simon Gilbert/ Stuart Williams)</p> <p style="text-align: center;"><b>Councillor Caro Wild</b> Climate Change</p>		
Potential Impact(s)		Last Reviewed		Movement from	Target	What we plan to do to meet target	
<p><b>Flood &amp; Storm</b></p> <ul style="list-style-type: none"> <li>Loss of life and risk to life</li> <li>Direct damage to property, utilities and critical infrastructure</li> <li>Blight of Land and Development</li> <li>Disruption to service delivery</li> <li>Contamination and disease from flood and sewer water and flood on contaminated land</li> <li>Increase in health issues</li> <li>Break up of community and social cohesion</li> <li>Increase cost of insurance</li> <li>Migration of ecosystems</li> </ul>		<p><b>Q2 2022/23</b></p> <p><b>Q2 2022/23</b></p>	<p>prev Qtr</p> <p style="text-align: center;">↔</p>	<p><b>2022/23</b></p>	<p><b>Flood &amp; Storm</b></p> <p>The following actions are ongoing :</p> <ul style="list-style-type: none"> <li>Develop, submit to Welsh Government and publish by October 2023, a combined Flood Risk Management Strategy and Flood Risk Management Plan as required by The Flood and Water Management Act (2010) and The Flood Risk Regulations (2009) respectively <b>Q3 2022/23</b></li> <li>Develop enhanced engagement programme with partners supporting the public in enhancing their own resilience - this will be a key aspect of the above Plan - initial discussions with Dwr Cymru/Welsh Water and Natural Resources Wales (NRW) have taken place <b>Q3 2022/23</b></li> <li>Improve communication on what to do in a flood and raise awareness of risk - as above - initial talks underway to produce a role &amp; responsibilities video, as well as flood safety guidance in co-operation with Dwr Cymru/Welsh Water, NRW and Blue Light organisations <b>ONGOING</b></li> <li>Improve the service provided by the SuDS Approval Body (SAB) - ongoing - improvements planned with additional resource Recruitment process commenced and due to be implemented in <b>Q3/4 2022/23</b></li> <li>Deliver guidance to increase standards and ease of development - in development <b>Q4 22/23</b></li> <li>Asset management - <b>ONGOING</b></li> <li>Develop Flood Risk Management Strategy - Phase 2 of new gully maintenance schedule delivered by EOY <b>Q1 23/24</b></li> </ul>		
Type(s) of Impact		Linked Risks		Linked Documents		Key Indicators / Measures used to monitor the risk	
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>		<ul style="list-style-type: none"> <li>Coastal Erosion</li> <li>Air Quality</li> <li>Business Continuity</li> </ul>		<ul style="list-style-type: none"> <li><a href="https://www.evaccardiff.co.uk/">https://www.evaccardiff.co.uk/</a></li> <li><a href="https://www.cdp.net/en">https://www.cdp.net/en</a></li> </ul>		<ul style="list-style-type: none"> <li>Storm Events that meet silver &amp; gold emergency intervention</li> <li>Annual number of flooded properties and severity (statutory reporting)</li> <li>Energy use / renewable energy production of Cardiff Council</li> </ul>	

# Coastal Erosion

**Description**

Breach of current defences resulting in widespread flooding (current defences are ad hoc and are in a very poor condition)



**Risk Owner(s)**

**Andrew Gregory**  
(Matt Wakelam/ Gary Brown/ Simon Dooley)

**Councillor Caro Wild**  
Climate Change

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Incident management arrangements are in place, which whilst not preventative, represent a level of emergency management for a flood and coastal erosion risk event occurring in a significant storm event.

**Coastal Defence Scheme:**

- The Flood Risk Management Team are undertaking detailed design for the coastal defence scheme - the necessary works are holistic and cannot be phased, therefore residual risk rating cannot be lowered until the completed construction of the coastal defence scheme in its entirety.
- The inundation risk will be improved by implementing the coastal defence scheme, which will provide defence for a 1 in 200 year severe weather event, plus an allowance for climate change influence of 40%.
- The total costs associated with the Design, Early Contractor Engagement and Construction phases were originally estimated at £10.9m (Welsh Government 75% funding = £8.2m and CCC 25% funding = £2.7m)
- Formal application was submitted to Welsh Government (WG) under the WG Coastal Risk Management Programme and development of the Detailed Design and Full Business Case (FBC) was programmed for completion in May 2020, however was impacted by Covid-19.
- Work ongoing with Emergency Management to formulate interim measures.
- Detailed design and full business case ongoing

**Scheme Delivery Progress update:**

- Cabinet report June 2021 resolved that;
  - the principle design for the coastal protection scheme and the requirements within the draft full business case to be submitted to WG for the Coastal Risk Management Programme be noted
  - the procurement approach and evaluation criteria/weightings set out in the report be approved
  - the commencement of procurement for the construction contract to deliver the coastal defence improvements estimated at £23.5M be approved
  - a further report be presented to Cabinet with the final Full Business Case, including final tender costs, project risks and mitigations.
- Draft Full Business Case submitted to WG & refined as necessary - final WG approval & funding confirmation anticipated by early 2022
- Extensions for timescales due to Covid 19 delays, and complexities of ground conditions and therefore design, agreed with WG - funding for FBC increased to cover additional costs (plus WG grant % increase) and extended to 16 March 2022.
- Costs associated with the Outline and Full Business Cases and Design now 100% funded by WG. To allow for increase of allowance for climate change to 40% and additional works required from ground investigation results, the construction phase is now estimated at £25M (WG 85% funding = £21.250M and CC 15% funding = £3.750M)
- PQQ procurement process completed and select list of 5 contractors established - required to submit returns in Jan 2022. Due to complexities of project, challenging environmental conditions for construction works and NRW requirements, extension for submission granted to mid Feb, with submission, assessment, selection and award process forecast to be completed early 2022.
- Marine Licence application submitted to NRW and required process followed. Although the Flood Risk Management Team have had prolonged and constructive dialogue with NRW staff, NRW have stated that for the Marine Licence to be granted, a derogation will be required to be signed off by Welsh Government Ministers under the process known as Imperative Reason of Overriding Public Interest (IROPI). This process has put the requirement to be on site by end of 21/22 financial year out of reach. WG were therefore contacted, meetings held and agreement secured for funding deadline to be further extended to 31st Aug 2022. This allows us to start on site in the new financial year, although we will still be pushing for the earliest possible start date. Marine licence has now been granted and advertised and Environmental Impact Assessment approved.
- Tenders returned in Feb 2022 and although clarifications, advice and extensions of time were granted, only one contractor made a submission. The estimated costs of circa £30M, that included risk and optimism bias, was far exceeded and an estimated cost, including risk, of circa £40 - £45M was received.
- The Cabinet report to seek approval to award the contract to the successful contractor and commit to the 15% Council contribution was due to be entered into the March 2022 cabinet - due to the necessity to fully analyse and understand the submission and establish reasons for the significant increase, the March Cabinet Report was withdrawn.
- Further meetings with WG have taken place, they have expressed their concerns over the price increase and explanations have been presented. The funding for the east side would present an additional cost of circa £7 to 9M for Cardiff Council if it chose to protect the tip from erosion and coastal inundation.
- Cabinet report taken to September 22 Cabinet to seek approval to go to tender with the reduced scheme

**What we plan to do to meet target**

We will be designing & delivering an effective coastal flood protection scheme as a matter of priority - Anticipated construction starting 2023, with completion 2025/26.

Due to the costs of funding the East side (Lamby Way), that WG will not fund, it has been removed from the scheme. Further meetings have taken place with WG to inform them of the decision and the potential way forward

Scheme commencement now not forecast until Q4 2022/23

Following completion of scheme the risk to properties will be addressed, however, a risk to significant infrastructure including Lamby Way landfill will remain in place, and will be dealt with as a directorate based risk.

Funding pressure bid to be submitted in October 2022 as part of the capital programme submission for 2023/24

**Keysteps:**

- Planning committee target date November/ December 2022
- Anticipated construction start - Q4 2022/23

**Potential Impact(s)**

- Continued coastal erosion along the coast threatening the Rover Way Traveller site and critical infrastructure including Rover Way and the Rover Way/Lamby Way roundabout
- Erosion to two decommissioned landfill sites, with risk of releasing landfill material into the Severn Estuary and having significant environmental impacts
- Flood risk to 1,116 residential and 72 non-residential properties over 100 years, including risk to life, property, infrastructure and services
- N.B. the predicted rates of erosion threaten the Rover Way Travellers Site and the adjacent electrical substation within 5 years, and further release of large volumes of unknown tip material from the Frag Tip into the Severn Estuary.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Health</li> <li>Reputational</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Strategic</li> <li>Service Delivery</li> </ul>
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**Linked Risks**

Climate Change risks

**Key Indicators / Measures used to monitor the risk**

- Award of contract for detailed design and Full Business Case - achieved
- Completion of detailed design and Full Business Case by May 2020 & submitted to WG
- Delivery programme of coastal protection scheme



# Performance Management

**Description**

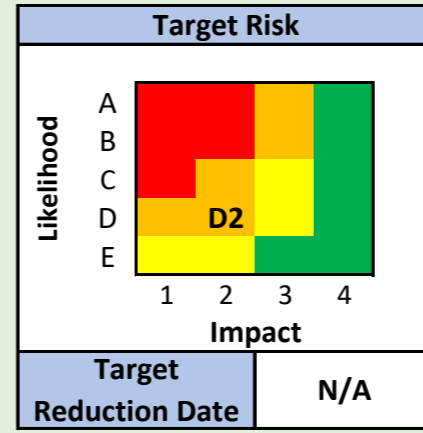
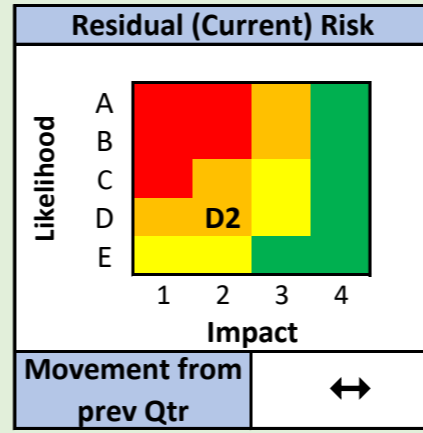
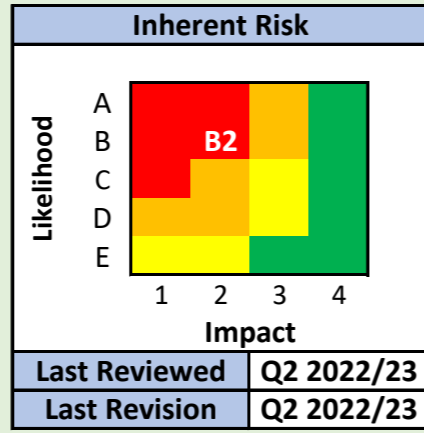
The risk that the Council's Performance Management arrangements do not provide timely performance information to allow the Council's political and managerial leadership to effectively deliver corporate priorities, statutory services or performance improvement

Performance Management arrangements are essential for discharging statutory requirements, delivering the administration's priorities and ensuring Council core business is delivered effectively. Weak corporate performance management arrangements heighten the risk of poor performance, service failure, financial overspend or legal non-compliance going unidentified, unchallenged and unresolved.

The Council must therefore maintain a focus on the Key Performance Indicators it has identified within the Corporate Plan as a pointer to overall organisational success. The Council must also ensure that more granular indicators of performance- the Council's Core Data which is managed by individual Directorates- are established and monitored to provide more detailed insight into the drivers of corporate performance.

Changes to the Statutory Performance Requirements have been set out in Local Government Bill and work is being undertaken to ensure the requirements are embedded in the Council's performance regime.

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**Risk Owner(s)**

**Sarah McGill**  
(Gareth Newell)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- In March 2022, the Audit Wales Assurance and Risk Assessment concluded that "The Council has made good progress in embedding new self assessment approaches into its routine governance arrangements".
- The Council's Annual Self-Assessment of Performance was considered by the Performance Panel- which brings together all Scrutiny Chairs- on Monday 12 September. This followed a robust self assessment process as set out in the Cabinet Report of February 2022. Next steps are outline opposite.

**What we plan to do to meet target**

End of Year Performance Report will be Considered by:

- PRAP Scrutiny Committee on 19 September 2022
- Governance and Audit Committee on 27 September 2022
- Cabinet on 20 October 2022
- Council on 27 October 2022

The recommendations of the internal Audit Report (Performance Management 2021/22, Effective with Room for Improvement) will be delivered in line with the dates included in the Internal Audit Action Plan. The recommendations focus on strengthened practice within Directorate Delivery Plans, and delivery timescales are below:

Action Date for Recommendation 1b: **30/9/23**  
Action Date for Recommendation 2: **30/3/2023**  
Action Date for Recommendation 3: **30/3/2023**

**Potential Impact(s)**

- Council unable to effectively deliver corporate priorities, statutory services or performance improvement
- Failure to comply with performance duties set out in the Wellbeing of Future Generations Act and Local Government and Elections Act.
- Compliance failure leading to external sanctions and reputational damage.

**Type(s) of Impact**

- Service Delivery
- Reputational
- Stakeholder

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

Quarterly monitoring of corporate plan indicators (108) provide a pointer to organisational health and corporate performance. Corporate Plan indicators are also risk assessed as part of the performance monitoring process.

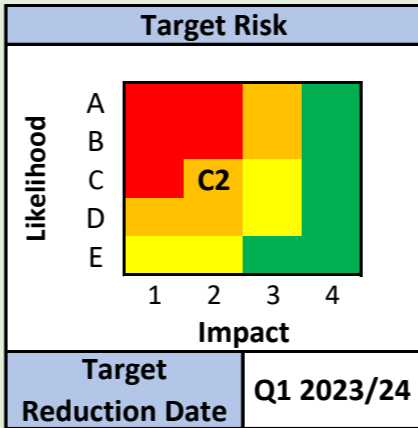
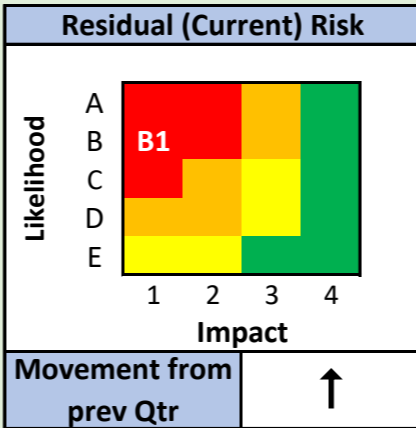
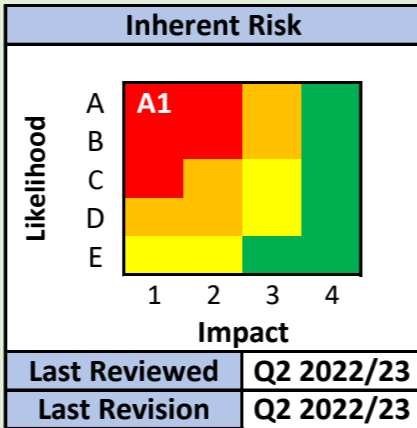
## Budget Monitoring (Control)

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Failure to achieve the budget set, inclusive of budgeted spend and savings across Directorates, with increased use of emergency finance measures and the unplanned drawdown of reserves.</p>				<p><b>Chris Lee</b> (Ian Allwood)</p>	<p><b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>								
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	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>• Clear financial procedure rules that reduce the level of risk of financial commitments being identified late in the financial year. The rules clearly set out the roles and responsibilities for budget management and are an area of interest for internal audit</li> <li>• Month 4 Monitoring report indicates a significant overspend will occur if current spend trajectory continues. Management controls have been put in place which include reviews on all vacant posts as well as controls on spend.</li> <li>• The Corporate Director of Resources and Chief Executive have held challenge meetings with each individual Director in order to ensure joint understanding of financial matters and any mitigations to be put in place in order to improve / maintain the respective Directorate financial position where appropriate.</li> <li>• Weekly meetings held in respect to key overspend areas in Children's Services and Education (Home to School Transport).</li> <li>• Focused work in areas of food, fuel and energy in order to ensure impact of price fluctuations is both understood and kept to a minimum in terms of rising costs. Monitoring and review processes are in place to understand the first six months impact of price fluctuations and consideration of position going forward into medium term.</li> <li>• Close working with Service areas in order to identify cost pressures and compensating mitigation strategies that impact on delivery of Capital Programme and repair schedules to ensure works remain within budget. Where those budgets cannot be maintained then consideration of delays / reprofiling of programme are undertaken.</li> </ul>			<p>2022/23 and the Medium Term</p> <ul style="list-style-type: none"> <li>• Review and refresh focus on key and review points in order to ensure focus is on areas of high uncertainty and cost impact as a result of exceptional inflationary pressures that arise in the financial year 2022/23 ONGOING</li> <li>• Monitor and review points put in place to consider risk assessments and mitigations for areas of capital spend. Q3 2022/23</li> <li>• Proceed with timetable to produce M6 2022/23 Report for Cabinet in November. Q3 2022/23</li> </ul>									
<b>Potential Impact(s)</b>	<b>Type(s) of Impact</b>		<b>Linked Risks</b>		<b>Key Indicators / Measures used to monitor the risk</b>								
<ul style="list-style-type: none"> <li>• Inability to balance spend against budget, for the financial year</li> <li>• Requirement to implement emergency measures to reduce spending during the financial year thus adversely impacting on ability to meet Corporate Plan objectives</li> <li>• Requirement to draw down from General Reserves at the year end</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder</li> </ul>		<p>Financial Resilience</p>		<ul style="list-style-type: none"> <li>• Monthly Directorate Monitoring reports detailing likely outturn position and performance against savings accepted</li> <li>• Review of use of earmarked reserves and balances - Half Yearly</li> <li>• Amount of Hardship Support claimed successfully</li> </ul>								
	<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>												

# Financial Resilience

**Description**

- Failure to deliver a balanced annual budget and a fully informed Medium Term Financial Plan.
- Lack of appropriate mechanisms to identify and manage unexpected financial liabilities.
- The current outlook is that there is a Budget Gap of £69 million for the period 2023/24 to 2026/27.



**Risk Owner(s)**

<b>Chris Lee</b> (Ian Allwood)	<b>Councillor Chris Weaver</b> Finance, Modernisation and Performance
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**Potential Impact(s)**

- Failing to meet statutory obligations and potential for service delivery to be adversely affected.
- Reaching the point where a s114 notice is required to be issued by the S151 Officer.
- Reputational damage to the Council.
- Needing to draw down significant unplanned amounts from reserves.
- Levels of borrowing become unsustainable.
- Inability to progress policy initiatives.
- Inability to manage adverse external factors - e.g. adverse settlements, WG rent policy etc.
- Financial constraints and budget proposals result in unintended consequences such as increased instances of non-compliance and financial impropriety.
- Requirement for significant savings at short notice that are therefore not identified in a coherent, strategic way and which impact on service delivery.
- Level of borrowing limits the ability of future generations to take forward new priorities.

**What we've done/are currently doing to achieve the Residual Risk Rating**

2022/23 and Medium Term

- Regular monitoring to understand the in-year position and gain early insight into emerging risks that need to be factored into the MTFP work. This includes the identification of earmarked reserves that were either increased during outturn of 2021/22 and those being reviewed to establish level of need reflecting the current priority is balanced budget.
- Engaging and working in partnership with directorates during the budget process to ensure that budget proposals and services are deliverable within timescales and quantum (revenue and capital)
- Mechanisms in place such as Treasury Management Reserve and Financial Resilience Mechanism in order to dampen the impact of a worse than anticipated financial climate / settlements.
- Preparation of Prudential Indicators and a local affordability indicator to help assess the affordability, prudence and sustainability of the capital programme and associated levels of borrowing
- Close alignment with Corporate Plan objectives, to ensure resources are allocated appropriately, and that longer term financial savings are developed in enough time to be realised.
- Regular review of contingent assets and liabilities, and provisions to ensure the Council has adequate cover for emerging liabilities.
- Robust monitoring of the impact of C19 and finalisation of all Hardship Claims to ensure all eligible items have been claimed prior to the ending of the Fund.
- An approved TM Strategy to mitigate risk - incorporates borrowing at fixed rates to reduce exposure to future interest rate fluctuations
- A Major Projects accountancy function supporting the identification of key risks / financial issues in relation to large schemes.
- Maintaining approach to robust financial control mechanisms and strengthening complex / areas of risk through training e.g. VAT.
- Undertaken initial assessment against CIPFA FM code with high level findings
- Work on establishing the financial implications to services both in the short, medium and long term because of the impact of the Covid 19 crisis, and detailed log of budgetary issues affecting 2022/23. This culminated in the inclusion within the 2022/23 Budget of a £10 million COVID Contingency Budget to protect the Council's resilience in light of the ending of the Hardship Fund on 31/3/22.
- Established a corporate approach to business case development, approval and post project monitoring to ensure expenditure assumed to pay for itself can do so over its expected life thus providing assurance that financial resilience will not be undermined by projects exceeding their cost parameters.

**What we plan to do to meet target**

2022/23 and the Medium Term

- Strengthening links between financial planning and asset management strategies, which consider the current condition of assets and future requirements. Q3 2022/23
- Identify clear, detailed plans and timescale for delivery of capital receipts targets. Q3 2022/23
- Enhance focus on a multi-year position (recognising limitations where settlement information is for one year only.) Q3 2022/23
- Review approach to governance and financial monitoring of special purpose vehicles to ensure liabilities and any financial guarantees are understood and are appropriate. Q3 2022/23
- Complete self-assessment against the CIPFA FM code and Balance Sheet Review and develop implementation plan in respect of any findings or recommendations, which provide further financial resilience. Q3 2022/23
- Confirm approach and reporting of commercial investments as part of standard monitoring processes and reports. Q2 2022/23
- Continue to keep cost pressures arising from economic turbulence, supply chains issues and labour / skills shortages under review in terms of their impact on costs, inflation and interest rates and the impact of these for the MTFP and Capital Programme QUARTERLY
- Continue work to frame how the better than anticipated Local Government Settlement for 2022/23 can support financial resilience next financial year and beyond. Q4 2022/23
- Implement requirements, where relevant arising from CIPFA's 2021 update of the Prudential Code and Treasury Management Code. To include development of some of the listed indicators below with regards commercial investment. Q4 2022/23

**Linked Risks**

Budget Monitoring (Control)

**Key Indicators / Measures used to monitor the risk**

- Financial Snapshot which highlights historical & current performance with regards budget monitoring, achievability of savings, levels of borrowing, and financial ratios.
- Outturn vs Budget: Main budget lines under or overspend as a % of budgeted expenditure.
- Delivery of planned savings: Total (£) unachieved planned savings as a % of total (£) planned savings.
- Use of reserves: 1) Ratio of useable reserves to Net Revenue Budget (NRB), 2) Amount of useable reserves used to balance budget as % of NRB.
- Council tax: 1) Council tax and other income as % of NRB, 2) Council tax collection rates (in-year actual).
- Borrowing: 1) Total commercial investment income as % of total net general fund budget, 2) Total (£) commercial investments and (£ plus%) amount funded from borrowing, 3) Borrowing related to commercial investments as % of General Fund total borrowing, 4) Capital interest costs and MRP as a proportion of NRB.
- Performance against Budget Timetable.
- Frequency / timeliness of engagement with SMT/Cabinet.
- Proportion of Savings Proposals in Realised or at Delivering stage.
- Section 151 Officer Statement in respect of capital strategy, adequacy of reserves and other statutory commentary.
- Consider usefulness of benchmarking data re: financial resilience produced by External Audit Bodies - e.g. Audit Wales

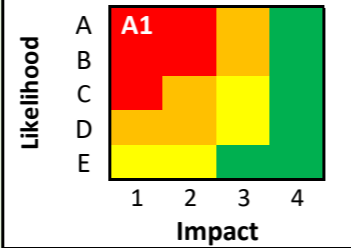
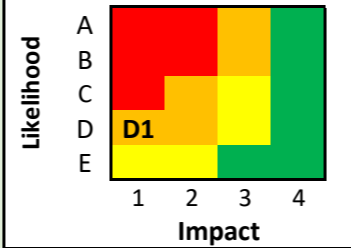
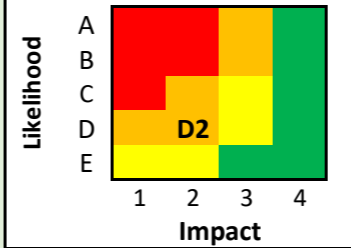
**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder</li> </ul>
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## Fraud, Bribery & Corruption

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Fraud, financial impropriety or improper business practices increase as internal controls are weakened as resources become severely stretched.</p>				<p><b>Chris Lee</b> (Ian Allwood)</p>	<p><b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>								
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<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>										
<ul style="list-style-type: none"> <li>The Council communicates a zero-tolerance approach to fraud, bribery and corruption.</li> <li>Regular review of relevant policies and procedures e.g. the Fraud, Bribery and Corruption Policy, Anti-Money Laundering Policy and Disciplinary Policy.</li> <li>Financial Procedure Rules and Contract Standing Orders and Procurement Rules and training.</li> <li>National Fraud Initiative data matching exercises in collaboration with the Cabinet Office and Audit Wales.</li> <li>Receipt and dissemination of fraud intelligence alerts from law enforcement agencies.</li> <li>Regular counter-fraud updates to the Section 151 Officer, Governance and Audit Committee, Portfolio Cabinet Member and the Chief Executive.</li> <li>Governance and Audit Committee review of the risk management, internal control and corporate governance arrangements of the authority.</li> <li>Independent assurance from Internal and External Audit on the effectiveness of governance, risk and control.</li> <li>Mandatory disciplinary e-learning module for all managers to complete and a programme of mandatory e-learning modules and training for Disciplinary Hearing Chairs, Investigating Officers and Presenting Officers.</li> <li>Fraud Publicity Strategy, to publicise the Council's approach to counter fraud work / sanction activity and explain the roles and responsibilities of key parties.</li> <li>Counter-Fraud and Corruption Strategy, with associated Fraud Awareness eLearning and face-to-face training rolled out.</li> <li>Annual participation in International Fraud Awareness week.</li> <li>Investigation Team provision of investigation and counter-fraud advice, guidance and support.</li> <li>SMT annual participation in CIPFA fraud tracker assessment and response.</li> <li>Revised 'Anti-Money Laundering Policy' approved by Cabinet in Q3 2020/21 and eLearning rolled out to officers with key roles and those working in high-risk areas.</li> <li>'Authorisation and Protocol Requirements for Review of Work Activities' approved by Cabinet in Q4 2020/21.</li> <li>Monitoring and reporting completion rates of mandatory fraud awareness training and anti-money laundering training.</li> </ul>			<ul style="list-style-type: none"> <li>Counter-Fraud and Corruption Strategy refresh during <b>2022/23</b>, with revised counter-fraud action plan to reinforce and drive the strategic intentions set, supported by awareness and training.</li> <li>Financial Procedure Rules to be reviewed (including the schools equivalent) and updated during <b>2022/23</b>, with awareness and training arranged. <b>ONGOING</b></li> <li>Review ongoing of the suite of Counter-Fraud Operational Policies alongside the review of the Council's Disciplinary Policy <b>ONGOING</b></li> <li>Training and awareness being rolled out on an Internet Investigation Procedure. <b>ONGOING</b></li> </ul>										
<b>Potential Impact(s)</b>			<b>Key Indicators / Measures used to monitor the risk</b>										
<ul style="list-style-type: none"> <li>Increase in frauds and losses to the Council</li> <li>Reputational risk as more frauds are reported</li> <li>Increased time investigating suspected fraud cases impacting on capacity</li> </ul>			<ul style="list-style-type: none"> <li>Progress in both (1) Counter-Fraud and Corruption and (2) Financial Procedure Rules review and update (including development of associated training and awareness materials / modules / campaigns)</li> <li>Mandatory Fraud Awareness eLearning completion and face-to-face attendance rates</li> <li>Anti-Money Laundering eLearning completion rates</li> <li>Delivery of Fraud Awareness week campaign annually</li> <li>Delivery of Policy updates in accordance with associated targets</li> <li>Delivery of mandatory investigating officer training and the note taker training</li> <li>Timely completion of casework and investigations</li> <li>Provision of timely investigation and counter-fraud advice, guidance and support to Directorates</li> <li>Adherence to the NFI Security Policy and annual completion of compliance forms</li> </ul>										
<b>Type(s) of Impact</b>			<b>Linked Risks</b>										
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>			<ul style="list-style-type: none"> <li>Stakeholder</li> </ul>										

## Information Governance

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Information handled inappropriately leaves the Council exposed to intervention and financial penalties issued by the Information Commissioner (ICO). This includes information held by Cardiff Schools.</p>				<p><b>Chris Lee</b> (Dean Thomas)</p>	<p><b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>								
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Target Reduction Date	Q4 2022/23												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>Gold level assurance has been achieved through the annual Cyber Security Plus ISAME Accreditation in September 2021, the next annual accreditation of this process will take place in September 2022.</li> <li>A quarterly Information Governance Report and briefings of decisions or recommendations are provided on a quarterly basis to the Information Governance &amp; Security Board, along with any concerns and risks from IG risk registers.</li> <li>A corporate Information Asset Register is held which details personal data assets held by each Council directorate. The next review scheduled for August 2022.</li> <li>Service Level Agreements in place for Schools Information Governance Support (All Cardiff Schools) and where Cardiff Council is the Data Controller for regional services, including Rent Smart Wales, National Adoption Service and Cardiff Capital City Deal.</li> <li>Corporate Retention schedule is in place and updated annually in line with any legislative changes or in line with any requests from services to update.</li> <li>Information Governance Maturity Model established to monitor risks against areas of information governance to feed into corporate risk status.</li> <li>The Digitisation of Paper Records Strategy and associated business process changes are in place with alternative delivery contracts in place to support increased paper storage demands, with processes established to support corporate programmes.</li> <li>Data Protection e-learning training available for Council staff to complete. Managers are able to monitor compliance with information provided as part of the Information Governance Board Report.</li> <li>National and Regional Information Governance Agreements in place in respect of covid-19 data processes</li> <li>An Information Governance Champions Group has been established.</li> <li>The Data Protection Officer has established a Data Protection Impact Assessment Panel to ensure that all changes to data processing activities are considered and any risks documented and escalated where necessary.</li> <li>Corporate escalation processes have been agreed to improve directorates failure demand with answering and providing information in respect of FOI requests .</li> <li>Support is being provided to Legal Services and HR with ensuring that an appropriate agreement is put in place to manage data protection risks associated with employee information data transfers and handling with TCS.</li> <li>Continue working with Childrens Services to finalise the new service delivery model for management of social services requests to improve compliance, accountability and processes.</li> <li>Continue to review data breach claim processes and reports and determine support models for future claim handling.</li> <li>Released training and education communications to support schools with their Information Governance responsibilities.</li> <li>All Directors have received a copy of the Record of Processing Activity (RoPA) and have been asked to prioritise this review for their respective directorates supported by Information Governance. The ROPA return will be used to support ICT with gathering information on non personal data systems and a review of security and protection linked with Cloud Impact Assessment processes</li> <li>A process has been established with procurement to identify new tenders involving personal data. Results from the Pre Tender Reports are then provided to ISB to enable Information Governance &amp; Security Board to have oversight of DPIA's completed against Procurement Contract Awards</li> <li>A paper was taken to ISB in relation to compliance with the 12 principles of the Surveillance Camera Code of Practice, A response has also been issued to the Surveillance Camera Code of Practice Annual survey and action plan for improvements will be initiated to improve accountability and compliance with CCTV operations when a response is received</li> </ul>			<ul style="list-style-type: none"> <li>Take forward, with support of an external supplier, options for alternative service delivery models for the Council's Records Centre linked to the Recovery and Renewal Programme. <b>Q3 2022/23</b></li> <li>Develop an online Publication Scheme taking onward recommendations from the Information Governance &amp; Security Board. <b>Q3 2022/23</b></li> <li>The Council has limited assurance of CCTV against compliance with the 12 principles of the Surveillance Camera Code of Practice - Options paper to be presented to ISB resulting in an action plan for improvements is being initiated to improve accountability and compliance with CCTV operations <b>Q3 2022/23</b></li> <li>A new FOI e-learning module is being designed and will be made available via Cardiff Academy. Training will be available to IG Champions and key FOI contact officers initially and compliance will be reported to Information Governance Board <b>Q4 2022/23</b></li> <li>A review of training options to Schools will be undertaken to ensure suitable refresher training on FOI and Data Protection will be available to all school staff <b>Q4 2022/23</b></li> </ul>									
<b>Potential Impact(s)</b>	<p>Leads to the Information Commissioner issuing notices of non-compliance</p> <p>These could consist of:</p> <ul style="list-style-type: none"> <li>A "Stop Now" Order which would mean that no personal data could be processed by the Council in its entirety</li> <li>An Information Notice which would mean that a service would have to provide information in a very limited period thereby impacting on service delivery</li> <li>A Decision Notice could be issued as a result of non compliance with an FOI/EIR request which would require information disclosure</li> <li>Undertaking which requires an Action Plan of Remedial Measures which would be subject to ICO Audit</li> <li>Enforcement Notice requires immediate improvement action to be put in place</li> <li>Financial Penalty up to £17.5 million for Higher Level Tier and £8 million for Lower Level Tier breaches of the Data Protection Act.</li> <li>Compensation unlimited liability claims for damages as a result of a data breach from individuals.</li> </ul>												
<b>Type(s) of Impact</b>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-right: 1px solid black;"> <ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul> </td> <td style="width: 50%;"> <ul style="list-style-type: none"> <li>Stakeholder</li> </ul> </td> </tr> </table>					<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder</li> </ul>						
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	<b>Linked Risks</b>			<b>Key Indicators / Measures used to monitor the risk</b>									
	<p>Cyber Security</p>			<ul style="list-style-type: none"> <li>Suite of IG Indicators/Service Metrics</li> <li>No. of ICO complaints</li> <li>No. of FOI /EIR SAR Requests</li> <li>No. of individuals trained on Data Protection</li> <li>No of Data Protection Impact Assessments being undertaken</li> <li>No of data protection breach complaints/claims</li> </ul>									

# Cyber Security

**Description**

There are 10 areas of potential risk within the National Cyber Security Centre cyber risk model.

Five of the 10 areas have been identified as high risk as follows:

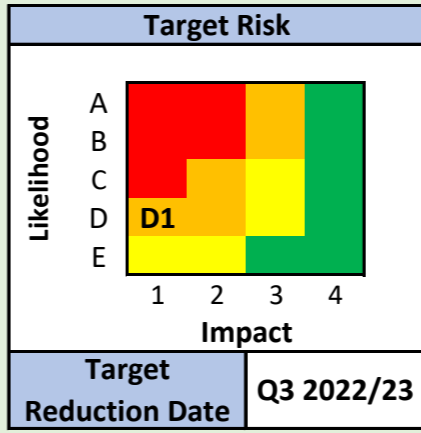
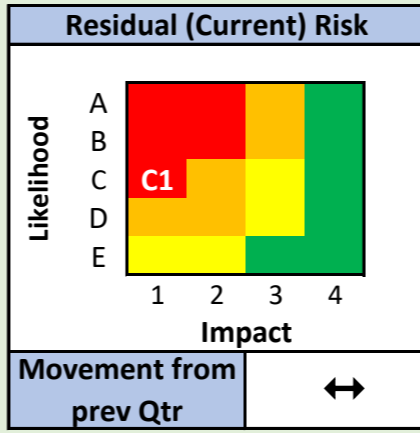
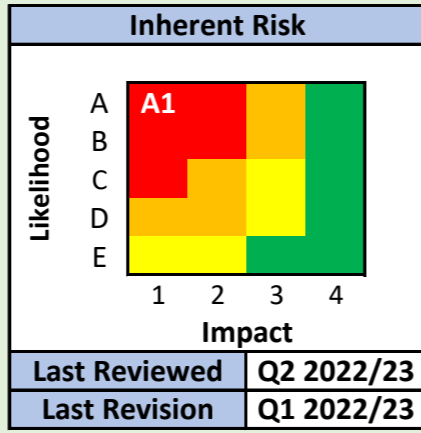
Architecture and Configuration - The need to ensure that good cyber security is baked into systems and services and can be maintained and updated to adapt effectively to emerging threats and risks.

Vulnerability Management - The majority of cyber security incidents are the result of attackers exploiting publicly disclosed vulnerabilities to gain access to systems and networks.

Data Security - With the increasingly tailored ransomware attacks preventing organisations from accessing their systems and data stored on them, security measures should include maintaining up-to-date, isolated, offline backup copies of all important data.

Logging and Monitoring - the volumes of systems, applications and audit logs do not lend themselves to easily assess how and when systems are being used, leading to an ineffective response to deliberate attacks or accidental user activity

Supply Chain Security - 2018 Internal Audit identified contract, SLA and service management weaknesses in externally hosted services



**Risk Owner(s)**

**Chris Lee**  
(Phil Bear)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

The principal controls for the high risk areas are as follows:

- Architecture and Configuration - ICT Management reviewed Ransomware report and has implemented improvement action dates. ICT lifecycle and notification targets are being monitored and managed through the 'ICT Platforms' risk actions.
- Data Security - security risk outputs for Cloud Impact Assessments and internal services are tested using WebInspect. TLS Email is used for protecting email in transit. Internal backup solution backs up all virtual and physical servers.
- Logging and Monitoring - Log analysis is undertaken on a prioritised basis with incident reporting to ISB and discussed with IAO - risk of vulnerabilities could be further mitigated with additional resourcing for log monitoring - this is under continual review.
- Supply Chain Security - Maturing PIA & CIA process used to assess risks to data and technology solutions

**What we plan to do to meet target**

**SMT**

- To implement NCSC Board Toolkit review to increase overall Cyber Security posture. **ONGOING**

**Architecture and Configuration**

- Governance and management requirements to be formalised for periodic and systematic review of all ICT systems. **ONGOING**
- To ensure strong ICT cloud security controls:
  - Collaboration between ICT and IG to develop and map current ICT system providers in phased development of an Information Asset Register. **ONGOING**
  - ICT and Information Governance (IG) Teams to liaise with FM for physical security assurances and to promote an incident reporting culture. **ONGOING**

**Vulnerability Management**

- Implement vulnerability management programme to bring services in-line with existing ICT internal patch policy. **ONGOING**
- Meet patching obligations that exist within compliance frameworks and contractual obligations with vendors. **ONGOING**

**Supply Chain Security**

- SIRO to review / consider Cloud Infrastructure to ensure:
  - Assurance of effective governance and management.
  - Resource, risk appetite and outcomes required.
  - Education of business systems owners in risk and management of cloud based services.
  - Privacy Impact Assessment / Cloud Impact Assessments to be reviewed to ensure compliance with the requirements of the General Data Protection Regulation (GDPR) Action Plan being managed by the Information Governance Team. **ONGOING**

**Potential Impact(s)**

The intent of cyber attackers includes, but is not limited to:

- financial fraud;
- information theft or misuse,
- activist causes to render computer systems intolerable and to disrupt critical infrastructure and vital services.

The impact of a cyber-attack / incident has the potential to involve the realisation of the risks associated with:

- An information governance breach (i.e. Stop Now Order, Information Notice, Enforcement Notice, Financial Penalty etc.)
- A business continuity incident – with a potential for major loss of service and legal, health and safety and financial implications.
- A financial / fraud related attack.

A malicious attack could result in loss of confidence from those transacting with the Council (reputation), as well as legal, asset, system, operational and financial implications.

**Linked Risks**

Information Governance

**Key Indicators / Measures used to monitor the risk**

- Threat intelligence from National Cyber Security Centre (NCSC), including national posture and guidance via the National Cyber Security Strategy/Programme
- Threats and risks highlighted by NCSC Cyber Security Information Sharing Partnership (CiSP), Cymru WARP (Warning, Advice and Reporting Point) and Welsh Government/WLGA
- General UK posture and issues raised in national and local media
- Number of compromises - breaches are monitored, investigated and reported back via Information Security Board and where applicable the ICO
- Monthly reporting of number of virus attacks via email blocked

**Type(s) of Impact**

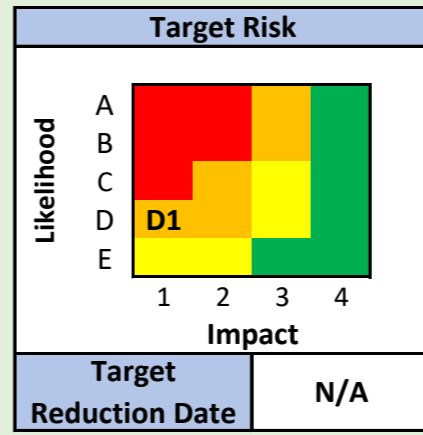
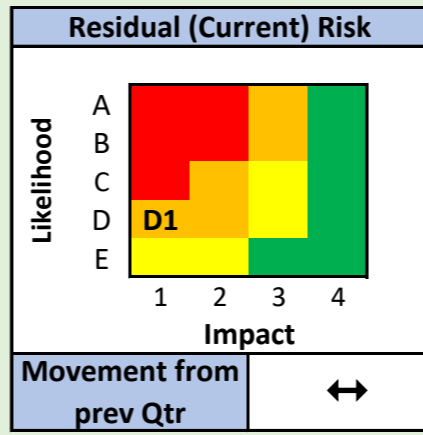
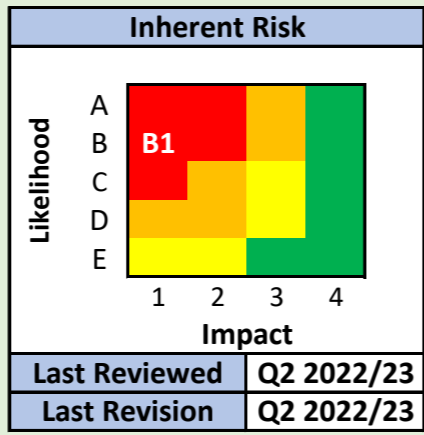
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> </ul>
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# Business Continuity

**Description**

Large scale incident/loss affecting the delivery of services.

The potential risk is that our most time sensitive activities are not sufficiently resilient and fail, following an incident which impacts on their delivery and that our incident management structure, used in response to internal incidents and external emergencies, also fails in response to an incident.



**Risk Owner(s)**

Chris Lee

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- The Council has a BCM Champion who sponsors BCM at a strategic level
- We have an approved Business Continuity Policy which is aligned to ISO22301
- BCM toolkit is available on CIS or by contacting the Resilience Unit, as the organisation continues its transition to SharePoint.
- The Council employs a Business Continuity Officer who is a qualified ISO22301 lead auditor.
- The Council has a 24 hour Incident Management structure for Gold and Silver Officers.
- Cardiff Council is a member of the Core Cities Business Continuity Group
- Q2 of 2022/2023 saw the council undertake a full review and update of the activities delivered across the council allowing us to focus on the resilient delivery of key activities. This was carried out by Each Directorate Management Team.
- As a result of the Covid-19 pandemic areas were forced to change to a far more agile way of operating with our core ICT requirements changing to support far more agile/home working. The mode of delivery worked exceptionally well and provides the potential for longer-term resilient agile working in, in addition to positively supporting other aims and corporate risks, as long as the ICT that supports this mode of working can be delivered resiliently.
- The Emergency Management Unit has developed an Incident Management Plan (Cardiff Council's Emergency Management Plan) to ensure alignment with ISO22301. This was fully reviewed and updated in 2021
- Internal Audit completed an audit of the Business Continuity Risk in Q4 of 2021/2022 and the assurance statement was "Effective with opportunity for improvement".
- The Resilience Unit supported directorates in looking at supply chain risks following the tragic war in Ukraine, this work will be on going as the risk horizon changes as a result of the conflict.
- The Business Continuity Programme recommenced in Q1 of 2022/2023.
- In Quarter 2 the Resilience Unit initiated a Horizon Scan on energy security and potential issues for the security of gas and electricity provision for Winter of 2022/2023 and how the UK position could impact on key service delivery.
- The Resilience Unit delivered a briefing to the SMT on the emerging risks around the security of energy supplies for winter 2022/2023. As a result SMT asked the Resilience Unit, to carry out targeted work to supporting the wider organisation in some targeted risk and resilience work around this potential risk. This work will continue into Q3 to support the resilient deliver of key services should the UK experience risks to energy supply this coming winter of 2022/2023.

**What we plan to do to meet target**

- The BC Officer is working to develop and enhance individual Directorate response capability to ensure Directorates are in a stronger position to respond to incidents which could impact on the Council and our most time sensitive activities this will be reviewed again in Q3 of 2022/23.
- The BC officer is continuing a review of 4x4 resources across the council to support our response capability to deal with the potential of winter storms. The next updated review will be carried out in Q3 of 2022/23.
- The Business Continuity Officer will support areas in identifying key learning from the pandemic and ensure that key risks/lessons/processes that feed into the councils resilience capability are incorporated into our ongoing planning to support us in being ready for ongoing risks. This will, where appropriate, involve a review and update of individual BC plans by Directorates and also a review and update of the councils Emergency Management Plan. This work will be done as areas bring their planning up to date and should be complete by Q3 of 2022/23.
- The Business Continuity Officer will support areas in undertaking targeted work around the emerging Energy security Risk focussed on key Red activities delivered by the council. This should be complete in Q3 of 2022/23

**Potential Impact(s)**

- Health and Safety** – potential impact on staff and on the public relying on our most, time sensitive, critical services
- Legal action** -Failure of key services could lead to Legal action against the council
- Financial** - Failure of key services could led to significant financial cost both in terms of Ombudsman action and Enforcement action from regulatory bodies, as well as individual legal action against the corporate body where service failure leads to legal action against us from private claimants
- Reputational** - Impact on key services to the public could lead to significant reputational damage to the organisation
- Stakeholder** – Impact on key stakeholders as result of failure
- Service delivery** – Potential significant impact on service delivery to the public, impact of key services could lead to significant impacts to the public and the corporate body un delivering its services

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial
- Health & Safety
- Stakeholder

**Linked Risks**

Brexit Risk

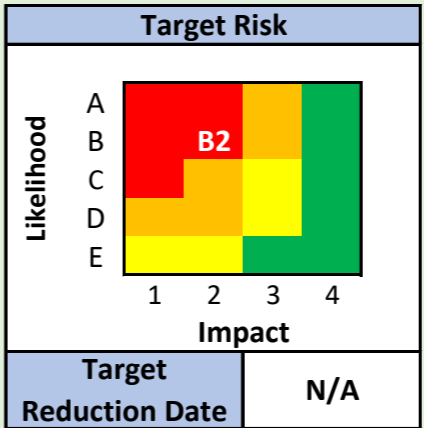
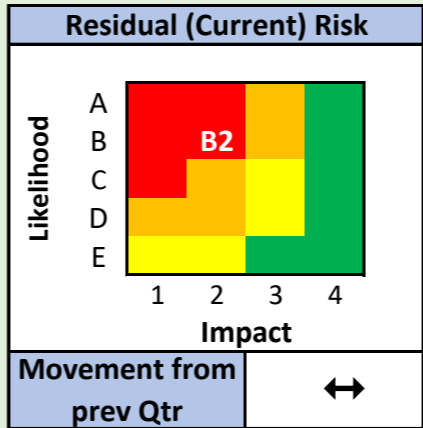
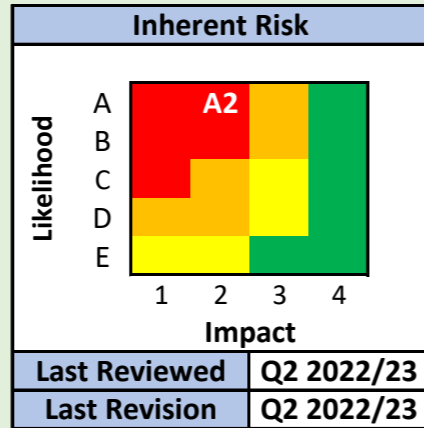
**Key Indicators / Measures used to monitor the risk**

The Red activity BC plan status is reviewed via a report to SMT . Additionally the risk is managed as part of the Corporate Risk Management process via the CRR returns and the BC risk is also audited by Internal Audit . The last Internal Audit of the Business Continuity Risk was in in 2021/2022.

# Welfare Reform

**Description**

That the Council cannot meet its statutory obligations with the increased demands and reduced budgets placed upon it by the Welfare Reform including: Universal Credit, further reduction in Benefit Cap and size restrictions for social tenants. The potential impact of these changes on rent arrears, homelessness and child poverty make these changes a significant risk. In 2022 the DWP will commence the rollout of migration for claimants from legacy benefits to Universal Credit.



**Risk Owner(s)**

Sarah McGill (Jane Thomas)	Councillor Lynda Thorne Housing & Communities
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**Potential Impact(s)**

- Benefit claimants are priced out of the private rented sector market
- Private landlords stop renting to benefit claimants
- Private landlords leaving the rental housing market
- Social housing rents become unaffordable to some claimants, in particular those with large families
- Increased homelessness and demand for temporary accommodation – increased numbers seeking help with homelessness due to loss of private sector accommodation has already been seen. This is expected to increase further with the end of the evictions ban.
- Increased rough sleeping
- Increased rent arrears, increased evictions - The impact on council tenant rent arrears has already been considerable and is having an impact?? on the HRA, this will continue to increase as more tenants move onto Universal Credit.
- Redeployment / Severance for housing benefits staff
- Changing demands on Council stock resulting in increased costs and/or undersupply of smaller properties
- Increased council rent arrears could impact on HRA and lead to barriers to building additional affordable housing
- LA less likely to pre-empt those who may be affected by changes and therefore unable to put mitigation steps in place This has already had a negative impact as the number of families affected by the Benefit cap who the advice teams have been able to initiate contact has reduced.
- Increase in poverty and child poverty, potentially an increase on demand on social services
- Rise in cost of living pushing people further to crisis point, and affecting those who wouldn't ordinarily require support from Council Services i.e. those in work, those with mortgages/homeowners

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Communities staff continue to work closely with private sector landlords and advice agencies to mitigate wherever possible the reduction in benefit income to help prevent eviction. The Rent Arrears Pathway has been created using a one front door approach, supporting people to access the help they need to pay their rent or any arrears they have accrued.
- New schemes and incentives have been created to support both Landlords and tenants to obtain and retain accommodation in the PRS these include rent in advance and bonds, help with the cost of repairs and bespoke packages.
- Housing Options have undertaken a review of staffing levels due to increased demand on the service with prevention of homelessness its core objective. A range of support interventions are offered to tenants and landlords to reduce those needing to access homeless services.
- Increased partnership working to ensure that specific groups are encouraged to access help at the earliest opportunity. The service is being marketed to reach as many vulnerable clients as possible, working with Rent Smart Wales, Community Hubs, CAB and Cardiff Credit Union.
- Housing Solutions and Housing Help line has moved to the Advice service. This will ensure that those who are homeless or threatened with homelessness can access advice and support in their own community, or over the phone and be triaged into the right help. A successful initial pilot was carried out for Prevention Advice in Hubs, to test further expansion.
- Housing Options service are working with third sector partners to help clients move into settled accommodation in the private rented sector, primarily for single people with low support needs who have lived in supported accommodation.
- A streamlined process is in place for re-housing tenants who need to downsize as a result of the social housing size restrictions. DHP is being used to pay removal costs and to cover shortfall while tenants are waiting to move. Welfare Liaison team within the housing service is in place to assist tenants affected by the changes. Work has been carried out to identify those affected by the Benefit Cap and to advise them accordingly and to identify the most vulnerable families and award DHP.
- DHP process has been reviewed to ensure that all those who request a DHP are given budgeting, income maximisation and debt advice.
- Digital inclusion training and Universal Credit Support has been rolled out across all the Community Hubs, Adviceline and Housing Helpline.
- Further additional resource has been agreed for supporting council tenants following the implementation of Universal Credit Full Service as rent arrears have increased significantly, staff have been recruited to assist with this and the new team is working well. Rent arrears procedure has been reviewed to include a more preventative and flexible approach and more assistance for more vulnerable tenants.
- Regular meetings are held with social housing providers to monitor and improve processes.
- In depth assessments continue to be completed at point of presentation to include a financial statement which will allow discussion to be had around possible expenditure concerns.
- Expansion of the Private Rented Sector Housing Solutions Team to include a dedicated single point of contact for landlords, and dedicated phone line for landlords will mean contact is easier.
- Digital and budgeting support available from Into Work and Money Advice on a Saturday for the first time for those who are claiming UC and in work.
- Prevention team now moved over to Advice Service, aligning with the Housing Solutions team; review of the service has been carried out and will remove duplication of work. Prevention Officers will provide support from Community Hubs across the city.

**What we plan to do to meet target**

- Funding has been allocated to the Money Advice Team for 1 year to increase staffing, which will help with the negative impacts of both Welfare Reform and the pandemic on citizens. A request will be made to extend this by another year. Further funding opportunities for the Money Advice Team are being explored, to allow the service to expand to keep up with demand in light of the Cost of Living Crisis **Q4 2022/23**
- Work with WG to ensure that any new financial support schemes are designed in consultation with us. **ONGOING**
- Complete review into PRS. As part of our new LETS (Landlord Enquiries & Tenant Support Service) initiative we are contacting landlords to discuss the various options that we can offer, such as the Welsh Government Leasing Scheme and our own tenant matching scheme. The schemes offer a range of support services and benefits to the applicant and to the private landlord with the aim of making tenancies successful for both parties. **Q3 2022/23**
- Introduction of landlord portal so that HA's and in the future, private landlords can access information quickly about amount of and dates of payments due online **Q4 2022/23**
- Additional training will be provided when the migration of UC commences. **ONGOING**
- Increase in Homeless Prevention staff to work with clients at risk of homelessness at the earliest opportunity. Service can be provided from a partner building, community hub or in a client's home to increase engagement. **Q3 2022/23**

**Type(s) of Impact**

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**Linked Risks**

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**Key Indicators / Measures used to monitor the risk**

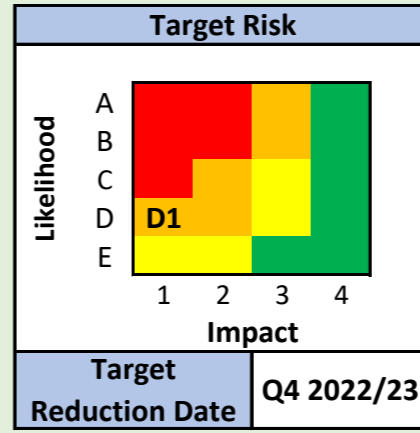
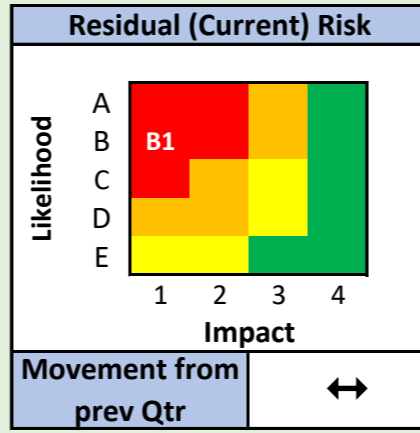
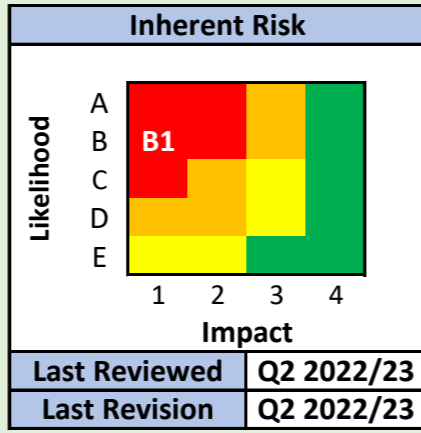
Number of customers supported and assisted with their claims for Universal Credit
Additional weekly benefit identified for clients of the city centre advise team



# Increase in Demand (Children's Services)

**Description**

Failure to effectively manage demand (and respond to increasing demand due to Covid-19), resulting in increase in number of children requiring services and financial pressures this presents.



**Risk Owner(s)**

Sarah McGill  
(Deborah Driffield)

Councillor Ashley Lister  
Children & Families

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Early Help - Cardiff Family Advice and Support Services for families who do not require statutory services
- Interventions Hub launched and now incorporates the Adolescent Resource Centre.
- Referrals to services such as Safe Families and Ymbarel made as required to provide families with required support
- Dedicated worker to focus on young carers in post.
- Increased in house residential provision, including emergency pop up / pop down provision.
- Option for families to use Direct Payments available (review being undertaken and will consider potential use for children other than children with disabilities).
- Shifting the balance of care and associated workstreams being progressed - Strength based working / Reunification Framework / Family Group Conferencing / Safe and Together model / Integrated Edge of Care Service for Young People - The Right Place - based on the North Yorkshire model.
- Delivering Excellent Outcomes Children's Services Strategy being reviewed.
- Children's Commissioning Strategy and Market Position Statement in place to address accommodation sufficiency issues and to manage the market
- Refreshed workforce strategy in place to improve recruitment and retention of permanent staff
- Work to enable prudent social work / skill mix ongoing - ensuring social workers do what only social workers can do and recruitment to support staff / multi disciplinary staff.
- 4th team implemented in each locality to increase management capacity.
- OM1 posts created and appointed to - to provide strategic overview of case management and support services.
- Working hours are flexible to meet service and personal needs.
- Provision and analysis of performance information is tailored to meet arising issues (e.g. monitoring domestic violence and development of PowerBi reports).
- Appropriate use of COVID-19 expenditure claims and Recovery Fund from Welsh Government and other funding streams; and financial planning around how longer term needs will be met.
- Temporary Resource Assistants recruited for OMs and social workers to test proof of concept.
- Vulnerability Change Project is reviewing the police mechanism for referrals to Children's Services - with the aim of reducing PPNs on low level cases.
- Resource Panel in place to oversee decisions regarding placements.
- Family Drug and Alcohol Court pilot ongoing to better support parents with drug and alcohol issues through the care proceedings process.
- 2 urgent projects launched to address demand and accommodation sufficiency issues - one to specifically focus on services for children with disabilities and another to consider the wider cohort of children being looked after.
- Ongoing adherence to COVID-19 risk assessment and appropriate use of PPE etc. to reduce the risk of infection for staff undertaking home visits.
- Established an Improving Placement Options Programme Board, meeting weekly to provide corporate support and oversight of specific project activity to respond to the significant increase in service demand and associated increase in expenditure
- Business case to increase the family support service resource in the Interventions Hub to provide an out of hours service being considered.
- Consideration being given to Rapid Response workers being reintegrated into locality teams in response to feedback from staff.
- Consideration being given to developing the role of Trusted Adults for children and their families.

**What we plan to do to meet target**

- Business processes to be reviewed as part of implementation of Eclipse system **2023 - Autumn**.
- Work with judiciary re: planned changes to private and public law **Q4 2022/23**.
- Systems review undertaken with initial focus on the front door to ensure sustainability of services going forward - report pending and will be reviewed and actions to be taken / steps planned on receipt **Q3 2022/23**.

**Potential Impact(s)**

- Family breakdown leading to children becoming looked after.
- Growth in the number of children entering the looked after system and associated costs for the Authority.
- Insufficient placements to meet need resulting in increase in numbers living outside Cardiff.
- Challenges in improving outcomes for children leading to children being less likely to achieve their potential and to be fully participating citizens.
- Delays in issuing care proceedings because of existing capacity in Children's Services and consequential impact on budgets if work needs to be outsourced.
- Challenges in effectively managing service and financial pressures.
- Impact of high caseloads on staff and potential increase in social worker turnover.
- Welsh Government programme of work to eliminate profit from the care sector and potential impact on destabilisation of placements.
- Increase in use of unregulated placements.
- Inability of Interventions Hub to meet demand for family support leading to delays in response times and / or the need to outsource the service.

N.B. All demand risks carry safeguarding implications.

**Linked Risks**

- Workforce Planning (Social Services)
- Safeguarding

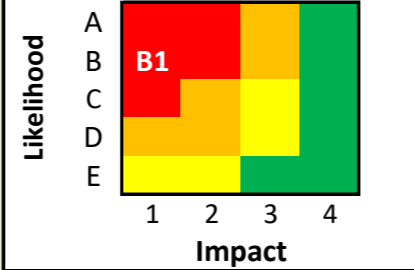
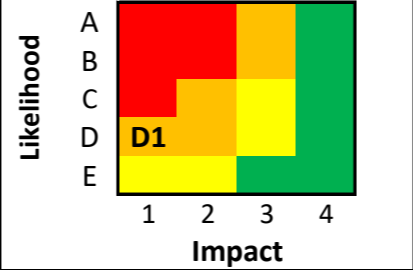
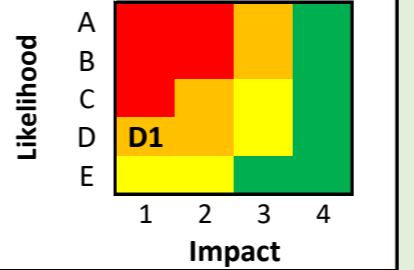
**Key Indicators / Measures used to monitor the risk**

- Children's Services:
- Early Help 1 - Number of people supported through the Family Gateway
- Early Help 2 - Number of people supported by the Family Help Team
- Early Help 3 - Number of people supported by the Family Support Team
- Contacts 1 - Number of Contacts / Referrals Received
- SSWB 24 - Percentage of assessments completed for children within statutory timescales
- CS LAC 3e - Number of children looked after

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>
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# Corporate Safeguarding

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)								
Systemic failure in the effectiveness of the Council's safeguarding arrangements together with other statutory safeguarding partners.				<p style="text-align: center;"><b>Sarah McGill</b> (Deborah Driffield)</p> <p style="text-align: center;"><b>Councillor Huw Thomas</b> Leader <b>Councillor Susan Elsmore</b> Social Care, Health &amp; Well-being <b>Councillor Graham Hinchey</b> Children &amp; Families <b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Last Reviewed</td> <td>Q2 2022/23</td> </tr> <tr> <td>Last Revision</td> <td>Q2 2022/23</td> </tr> </table>	Last Reviewed	Q2 2022/23	Last Revision	Q2 2022/23	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Target Reduction Date</td> <td>N/A</td> </tr> </table>	Target Reduction Date	N/A	
Last Reviewed	Q2 2022/23											
Last Revision	Q2 2022/23											
Movement from prev Qtr	↔											
Target Reduction Date	N/A											

Potential Impact(s)	What we've done/are currently doing to achieve the Residual Risk Rating	What we plan to do to meet target
<ul style="list-style-type: none"> <li>A child(ren) or adult(s) suffer(s) preventable abuse or neglect which may result in harm or death</li> <li>Reputation of Council and partners</li> <li>Severe adverse publicity</li> <li>Potential regulator intervention</li> <li>Loss of confidence by community in safety of children and adults</li> <li>Loss of confidence of staff in the overall "safety" of the service, impacting on morale, recruitment and retention</li> <li>Potential litigation with associated financial penalties</li> <li>Significant financial implications of formal intervention</li> </ul>	<p><b>Regional</b></p> <ul style="list-style-type: none"> <li>Regional Safeguarding Board oversee the safety and well-being of children and young people across the partnership.</li> </ul> <p><b>Corporate</b></p> <ul style="list-style-type: none"> <li>Corporate Safeguarding Board strengthened with development of Steering Group and appointment of Directorate Lead Officers</li> <li>Improved data capture and reporting on training compliance allowing targeted action by managers.</li> <li>New self-assessment form and process introduced, with identified improvement actions built into Directorate Delivery Plan.</li> <li>Initial Analysis of referral data completed, with further work underway to enable a more granular breakdown.</li> <li>Recruitment and Selection Policy updated, including additional information on safeguarding</li> <li>Recommendations of Audit Wales review actioned.</li> <li>Appropriate safeguarding arrangements in place for staffing local government elections.</li> <li>Education provision secured for high risk children throughout the COVID-19 crisis.</li> </ul> <p><b>Contextual Safeguarding</b></p> <ul style="list-style-type: none"> <li>Exploitation Strategy - led corporately with community safety approach.</li> </ul> <p><b>Children's Services (Summary Position)</b></p> <ul style="list-style-type: none"> <li>In terms of business continuity, our operational approach to child protection remains unchanged. Child protection procedures continue to take precedence and children at the highest risk will be prioritised. Operating model is review regularly.</li> <li>Systems in place to learn lessons from Child Practice Reviews, Adult Practice Reviews and multi agency practitioner forums.</li> <li>Safeguarding Adolescents From Exploitation (SAFE) approach reframed in light of experience and being implemented city wide.</li> <li>Quality Assurance Framework in place; learning workshops introduced to complete feedback loop. Action plan in response to complaints to be developed.</li> <li>Wales Safeguarding Procedures in place - training held and systems updated.</li> <li>High Risk Panel facilitates robust and timely multi-agency decision making at senior management level for our highest risk young people.</li> <li>OMs have oversight of all high risk cases and share decision making responsibility.</li> <li>Practice development group set up with leads allocated to workstreams to shape good practice.</li> <li>Children's Services and Education working closely, including in the development of locality working.</li> <li>Close partnership working (via Regional Partnership Board and Starting Well Programme) in response to the emerging crisis regarding young people with serious mental health and emotional wellbeing issues is ongoing (i.e. increase in eating disorders, self harm, and attempted and actual suicide).</li> <li>Close partnership working in relation to serious youth violence, including with Violence Prevention Unit and Community Safety is ongoing.</li> <li>Close partnership working in response to complex safeguarding concerns with providers, with particular emphasis on emerging issues with providers of accommodation and support for children with additional and complex needs is ongoing.</li> <li>Revised Supervision process launched following feedback from pilot and a new recording mechanism is being piloted.</li> <li>Child Sexual Abuse practice leads training programme with Centre of Excellence in place.</li> <li>Review of escalating concerns process underway to strengthen arrangements and interface with safeguarding procedures and large scale enquiries.</li> <li>Practice leads appointed in locality teams to support newly qualified staff and improve quality and consistency of practice.</li> </ul> <p><b>Adult Safeguarding (Summary Position)</b></p> <ul style="list-style-type: none"> <li>Review of escalating concerns process underway to strengthen arrangements and interface with safeguarding procedures and large scale enquiries.</li> <li>Development completed of an improved quality assurance process for care homes that includes monitoring visits undertaken by social workers in addition to Contracts staff and the commitment to undertake urgent (same day) on-site monitoring when serious concerns are raised.</li> <li>Advice / guidance has been produced for family members to inform them of what they should look for when choosing a care home for a loved one / when visiting a loved one in a care home and what they should do if they are worried / concerned about the quality of care.</li> <li>Quality Assurance Frameworks have been included with the DAPL and DPS Framework and this has been implemented.</li> <li>Contributing and supporting the regional review of MARACs is underway (domestic abuse MARAC, SWOT MARAC and Human Trafficking MARAC).</li> <li>Development of arrangements to support people who hoard and self-neglect and develop sustainable and holistic approaches to achieving outcome has been completed and is being shared with staff teams</li> <li>Young person's MDT in partnership with Children's services and Housing to address the needs of young people with complex transitional arrangements, behavioural difficulties or known risks has now been launched and is fully operational.</li> </ul>	<p><b>Corporate</b></p> <ul style="list-style-type: none"> <li>Targeted training work in front facing services with low take up <b>Q3 2022/23</b></li> <li>Review Safeguarding Policy following publication of best practice by Welsh Government <b>Q3 2022/23</b></li> <li>Data development work on cross council referrals <b>Q3 2022/23</b></li> <li>Output of self-assessments to be quality assured, included and tracked through Directorate Delivery Plans. <b>Q2 2022/23</b></li> </ul> <p><b>Children's Services</b></p> <ul style="list-style-type: none"> <li>Strengthen arrangements for responding to professional concerns. <b>Q4 2022/23</b></li> <li>Strengthen contractual arrangements in relation to safeguarding. <b>Q4 2022/23</b></li> </ul> <p><b>Adult Services</b></p> <ul style="list-style-type: none"> <li>Develop whole home large scale enquiry process <b>Q4 2022/23</b></li> <li>Partnership development activity between learning disabilities team, third sector services and adult safeguarding to better address incidents of SU on SU abuse in supported living services settings <b>Q3 2022/23</b></li> </ul>

Type(s) of Impact	Linked Risks	Key Indicators / Measures used to monitor the risk
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Increase in Demand (Children's Services)</li> <li>Workforce - Social Services</li> </ul>	<ul style="list-style-type: none"> <li>SCC.014 Percentage of initial child protection conferences carried out within statutory timescales during the year</li> <li>SCC.034 Percentage of child protection reviews carried out within statutory timescales during the year</li> <li>SSWB 27 Percentage of re-registrations of children on local authority Child Protection Registers</li> <li>SSWB 28 Average length of time for all children who were on the CPR during the year</li> <li>Res 15 - Percentage of Council staff completing Safeguarding Awareness Training</li> </ul>

# Legal Compliance

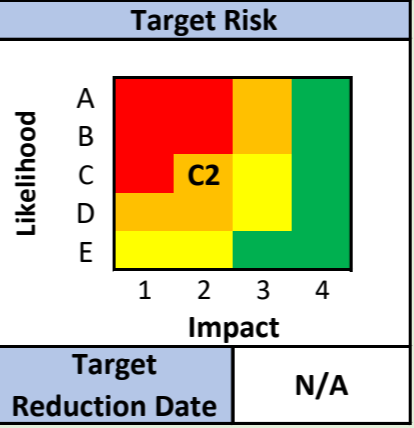
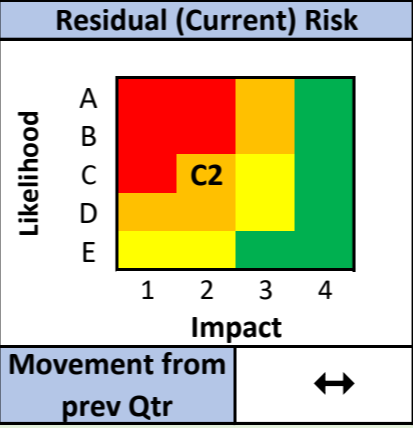
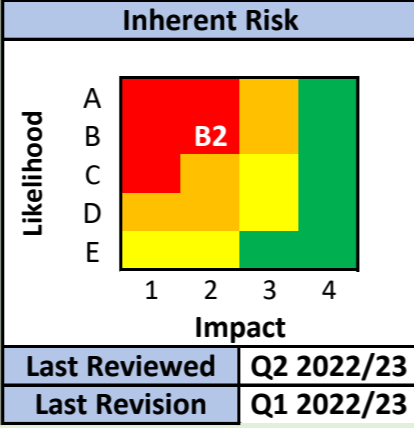
**Description**

Changes in services and staff roles across the Council resulting in:

- gaps in Council wide knowledge of the local authority framework of responsibilities and duties within which we have to operate;
- inability to deliver the services in accordance with all duties and responsibilities due to lack of resource:

In each case leading to increased risk of challenges.

Reduction and changes in front-line services, discretionary and statutory, will lead to increased risks of challenge from users and other stakeholders affected.



**Risk Owner(s)**

Davina Fiore

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Professional internal legal and financial advice provided to a high standard.
- Maintaining robust decision-making process by providing legal implications on all Council, Cabinet and Committee reports and Officer Decision Reports at Director level
- Appropriate use of NPS Legal Services by Solicitors Framework to increase resilience where it is necessary to outsource legal work
- Dedicated Corporate teams in specialist areas e.g., equalities, FOI / DPA
- Sharing training/publications received internally to the legal department and when necessary to client departments
- Encourage Directorates to ensure Committee and Cabinet reports are discussed at preliminary stage in development to ensure all legal issues are addressed early through client department relationships
- Decision Making Training to both the Senior Management Forum and the Managers Forum carried out in 2020 and Pre-Election Period and Decision-making Pre and Post the Local Election briefings given to the Senior Managers Forum and the Cardiff Managers Forum in January 2022
- Decision Making training session held for the Environment Directorate managers in Jan 2022
- Decision making training provided to Councillors and Cabinet as part of induction training.

**What we plan to do to meet target**

- Where identified, provide guidance based on standard precedents for use in cases of low value/low risk/repetitive matters to minimise the gaps in Council wide knowledge **ONGOING**
- Provide, if requested, ad-hoc legal training to Directorates to develop knowledge within Directorates of specific statutory functions. **ONGOING**

**Potential Impact(s)**

- Increase in number of challenges and complaints with consequences in terms of already stretched resources and impact of adverse decisions
- Implementation of decisions delayed due to challenges and potentially fatally disrupted
- Impact on projects if reputation for sound management and implementation of projects is damaged
- Major incident
- Adverse press/media reaction
- Involvement from Welsh Government in terms of performance standards or measures
- Increased costs
- Impact on capacity to deal with proactive legal work

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

Number of Judicial Reviews and Number of Successful Challenges

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**CALCULATION OF THE COUNCIL TAX BASE**

**FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR CHRIS WEAVER)**

**AGENDA ITEM: 12**

**Reason for this Report**

1. To seek approval of the Council Tax Base for 2023/24 which the authority is required to calculate in accordance with the statutory provisions governing Council Tax under Part 1 of the Local Government Finance Act 1992.

**Background**

2. Section 33 of the Local Government Act 1992 requires each billing authority to calculate the Council Tax Base each year. The Local Authorities (Calculation of Council Tax Base)(Wales) Regulations 1995, as amended, contain rules for this calculation, which in essence, are as follows:
  - a) Determine the number of chargeable dwellings in each valuation band, taking account of exemptions and anticipated changes during the year.
  - b) Adjust the numbers in each band to take account of the disablement reductions.
  - c) Allow for discounts in respect of disregarded individuals and those occupied by one person only.
  - d) Adjust for premiums on long term empty properties and second homes
  - e) Weight the adjusted total for each band to equate it to band D.
  - f) Repeat the calculation for each of the six Community Councils that issue precepts.

**Issues**

3. The Council Tax Base calculation is a complex annual exercise that is used by the Welsh Government (WG) for the distribution of Revenue Support Grant. It is also used by the Council for calculating the Council

Tax charges for each year. Appendices A to G set out the detailed calculation. As the Appendices are in a format prescribed by WG the following points explain the details included in those Appendices.

- The number of domestic dwellings in the valuation list in force at the 31 October is used and adjusted to take account of anticipated new properties, demolitions, appeals and exemptions which is represented as chargeable dwellings (line A1 Appendix A).
  - Properties in receipt of disablement relief receive a reduction of 1 band in their amount payable. Lines A2 and A3 reflect these adjustments. For example, the number of properties in band B (at line A1) amounting to 18,418 is reduced by 82 for those that will receive the 1 band reduction and increased by 300 for those properties coming down from band C. This gives a new total of 18,636.
  - An estimate of the number of single person discounts (B2a), double discounts (B2b) and premium for long term empty properties (B3c) are also taken into account in the calculation. The total in line C2 takes the total (A3) and adjusts for the weighted number of discounts and second home premium.
  - To convert the total in each band to a band D equivalent the appropriate ratio, as set out in line C3, is applied to reach the total band D equivalents in C4.
4. The total band D equivalent properties calculated are then adjusted to take account of the estimated collection rate, as well as any contributions in respect of Ministry of Defence properties, as follows:

<b>2022/23</b>		<b>2023/24</b>
151,328.61	Total Discounted chargeable dwellings: band D equivalent (a)	152,724.02
98.50%	Estimated Collection Rate (b)	98.50%
149,058.68	(a) x (b)	150,433.16
48.55	M.o.D. exempt dwellings: band D equivalent	48.55
<b>149,107.23</b>		<b>150,481.71</b>
<b>149,107</b>	Council Tax Base for tax-setting purposes	<b>150,482</b>

The table above shows an increase in the Council Tax Base of 1,375 properties at band D equivalent.

5. At the time that the Council Tax Base was set last year, it was anticipated that an additional 2,817 new properties would come into the Council Tax list during 2022/23. It is now anticipated that 2,207 new properties will be included in the list by 31 March 2023.

6. In previous years there has been a significant increase in the number of properties in receipt of student exemptions. Whilst there was a reduced number of student exemptions 2020/21 due to Covid-19, there have been increases in the past two years and we are projecting an overall increase in the total number of student exemptions for 2023/24.
7. The council tax base calculations have been reviewed to ensure that they reflect the current demographic makeup of properties and occupancy within the city. In future years due to the Local Development Plan and Cardiff Living it is anticipated the scale of development will continue to see increases in new properties and commensurate increases in the tax base.
8. Welsh Government assume 100% of the tax base for Revenue Support Grant, however, for Council Tax setting purposes it is necessary to assume an ultimate collection rate for 2023/24. Since 2016/17 we have used an ultimate collection rate of 98.5%. Whilst last year's collection rate was slightly lower than previous years, it is anticipated that as further recovery action including court work takes place, this rate will improve. The ultimate collection rate reflects the final position achieved after a number of years of collection rather than the in-year position. The most appropriate estimate of our ultimate collection rate is still 98.5%. This position will continue to be kept under review.

#### Schedule of precept payments

9. Regulations require that by 31 December each year the Council inform each of its precepting authorities of the proposed dates of monthly precept payments in the following year and determines a payments schedule by 31 January.
10. Currently instalment payments to The Police and Crime Commissioner for South Wales are paid on the last working day of each month and to the Community Councils on 1 April, and it is recommended that these arrangements should continue for 2023/24.

#### **Reason for Recommendations**

11. It is a statutory obligation for the Council to agree its Council Tax Base annually and this figure is used for Council Tax setting.

#### **Financial Implications**

12. The Council Tax Base will be used to set the specific Council Tax charges for 2023/24 when the budget is approved. There are a large number of variables that are included in this calculation such as new properties, demolitions, effect of appeals, changes to discounts and exemptions and it is important to ensure that the resulting estimate of properties is as accurate as possible. A small percentage variance could result in a large difference against the budget. The tax base calculation is also used by the Welsh Government for the determination of the distribution of Revenue

Support Grant. The final financial settlement from the Welsh Government will include the redistribution impact of these figures across Wales.

13. Whilst the council tax premiums are quantified and included as part of the council tax base calculation the resultant adjustment ensures that local authorities retain any additional income generated by the premium and does not result in any compensating reduction to revenue support.
14. The increase in the tax base, as set out in this report, is estimated to generate an additional £2,250,683 in 2023/24 without raising the actual rate of tax. The £2,250,683 represents additional revenue for the Police and Crime Commissioner for South Wales of £415,402 whilst Cardiff Council will receive an additional £1,835,281. At present, this is not taken into account in the draft budget position. Established practice is to wait until the Final Financial Settlement from Welsh Government before taking any benefits from increased Council Tax Base. This is due to the fact that if a Council's Council Tax Base increases relative to the tax base of other Councils, then Revenue Support Grant will reduce as a direct consequence.

### **Legal Implications**

15. The Council Tax Base is essentially the constituency of Council Tax payers having regard to the fact that some persons will be entitled to reductions in Council Tax and others will be eligible for exemptions from payment. The Council Tax Base is calculated in accordance with a complicated formula laid down in the Local Authorities (Calculation of Council Tax Base) (Wales) Regulations 1995, as amended ("the Regulations").
16. The central provision is regulation 3, which provides that the Council Tax Base is calculated by multiplying the total of the 'relevant amounts' by the authority's estimate of its collection rate for the year. It is therefore necessary to identify both the 'relevant amount' and the 'collection rate'.
17. Regulation 3 of the Regulations provides the formula for calculation of the Council Tax Base, using certain "relevant amounts", which are calculated, from April 2017, according to a formula set out in Regulation 5B. The relevant amount for each Council Tax band is a measure of the number of dwellings in that band after taking account of exempt dwellings, discounts and premiums.
18. The 'relevant amount' is the maximum sum which the authority would recover in respect of the dwellings in the particular band. However, the Regulations anticipate that this will not always be the case. Thus, in order to ascertain the Council Tax Base, it is necessary to determine the collection rate, which is estimated in accordance Regulation 3 of the Regulations. The Council must estimate its collection rate for the financial year by estimating the aggregate of the amounts in respect of Council Tax for the year which are likely to be paid to the Council expressed as a proportion of its estimate of the total of such amounts which are payable to the Council taking into account certain discounts. In order to calculate



the Council Tax Base, the authority then adds up the total of the relevant amounts previously calculated and multiplies this by the estimate of the collection rate. This leaves the 'Council Tax Base'.

19. The sum which the authority calculates must be raised locally in accordance with its approved budget is then divided by the Council Tax Base figure to give the 'basic amount of Council Tax' as defined in section 33 of the Local Government Finance Act 1992.
20. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how its decisions will contribute towards meeting the well being objectives (set out in the [Corporate Plan https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Pages/default.aspx](https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Pages/default.aspx) ). Members must also be satisfied that the decision complies with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
21. Calculation of the Council Tax Base is a local choice function, allocated in Section 3 of the Scheme of Delegations to Council. At the Council meeting in December 2013, the Council agreed to allocate responsibility for calculation of the Council Tax Base to the Cabinet (Council minute 129(5)).
22. All decisions taken by or on behalf the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers of behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

### **Property Implications**

23. The Strategic Estates Department have reviewed report in respect of the calculation of the Council's tax base and there are no particular issues identified, at this stage, from a property implications perspective for its non-residential estate. Any matters involving the Council's non-residential estate should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

### **HR Implications**

24. There are no HR implications for this report.

## **RECOMMENDATIONS**

Cabinet is recommend to approve the following resolutions:

- (1) the calculation of the Council's tax base for the year 2023/24 be approved.

- (2) that pursuant to this report and in accordance with the Local Authorities (Calculation of Tax Base) (Wales) Regulations 1995, as amended, the amount calculated by Cardiff Council as its Council Tax Base for the year 2023/24 shall be 150,482.
- (3) that pursuant to this report and in accordance with the Local Authorities (Calculation of Tax Base) (Wales) Regulations 1995, as amended, the amounts calculated by the Council as the Council Tax Base for the year 2022/23 in the community areas subject to a precept shall be as follows:

Lisvane	2,866
Pentyrch	3,605
Radyr	4,057
St. Fagans	1,941
Old St. Mellons	2,485
Tongwynlais	826

- (4) that the arrangements for the payment of precepts in 2023/24 to the Police and Crime Commissioner for South Wales be by equal instalments on the last working day of each month from April 2023 to March 2024; and to the Community Councils, be by one payment on 1 April 2023, reflecting the same basis as that used in 2022/23; and the precepting authorities be advised accordingly.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>CHRISTOPHER LEE</b>
	Corporate Director Resources
	9 December 2022

*The following appendices are attached:*

- Appendix A: Calculation of the Council Tax Base for the City and County of Cardiff
- Appendices B-G: Calculation of the Council Tax Base for the 6 Community Councils

Background papers

Council report, 'Calculation of Council Tax Base', 19 December 2013; and minutes thereof

**CARDIFF COUNCIL  
COUNCIL TAX BASE CALCULATION FOR 2023/24**

**APPENDIX A**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	4,856	20,192	34,196	36,626	30,741	21,822	10,383	2,791	1,444	163,051
All Chargeable Dwellings (A1)	0	4,188	18,418	31,583	34,696	27,175	20,182	9,979	2,717	1,435	150,373
Dwellings subject to disability reduction (A2)		8	82	300	382	364	338	191	46	55	1,766
<b>Adjusted chargeable Dwellings (A3)</b>	<b>8</b>	<b>4,262</b>	<b>18,636</b>	<b>31,665</b>	<b>34,678</b>	<b>27,149</b>	<b>20,035</b>	<b>9,834</b>	<b>2,726</b>	<b>1,380</b>	<b>150,373</b>
Dwellings with no discount or premium (B1)	2	1,100	7,857	17,251	20,621	18,216	14,728	7,810	2,254	1,195	91,034
Dwellings with one discount excluding long term empty and second properties (B2a)	6	3,117	10,554	14,156	13,746	8,703	5,161	1,953	455	168	58,019
Dwellings with two discounts excluding long term empty and second properties (B2b)	0	2	56	83	100	92	71	31	8	9	452
Dwellings with long term empty properties or second homes discount (B3b)	0	0	0	0	0	0	0	0	0	0	0
Dwellings with long term empty properties or second homes premium (B3c)	0	43	169	175	211	138	75	40	9	8	868
<b>Total adjusted chargeable dwellings</b>	<b>8</b>	<b>4,262</b>	<b>18,636</b>	<b>31,665</b>	<b>34,678</b>	<b>27,149</b>	<b>20,035</b>	<b>9,834</b>	<b>2,726</b>	<b>1,380</b>	<b>150,373</b>
Long term empty property & second home discount adjustment (B6)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Long term empty property & second home premium adjustment (B7)	0.0	21.5	84.5	87.5	105.5	69.0	37.5	20.0	4.5	4.0	434.0
Total dwellings including discounts (C2)	<b>7</b>	<b>3,503</b>	<b>16,054</b>	<b>28,172</b>	<b>31,297</b>	<b>24,996</b>	<b>18,747</b>	<b>9,350</b>	<b>2,613</b>	<b>1,338</b>	
Band D Relation (C3)	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent (C4)	3.61	2,335.50	12,486.44	25,041.78	31,297.00	30,550.97	27,078.64	15,583.75	5,225.50	3,120.83	152,724.02
Ultimate Collection Rate											98.50%
Adjusted for Class O exemptions											48.55
Council Tax Base for tax-setting purposes											150,481.71

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# CARDIFF COUNCIL COUNCIL TAX BASE CALCULATION FOR 2023/24

APPENDIX B

LISVANE

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	0	1	11	47	80	213	822	300	205	1,679
Dwellings per V.O. listing (+ projections)	0	0	1	11	69	91	225	866	316	223	1,802
Exemptions	0	0	0	-2	-5	-2	-11	-9	-6	-1	-36
Chargeable dwellings Total	0	0	1	9	64	89	214	857	310	222	1,766
Disablement Relief	0	0	0	0	0	2	12	6	2	0	22
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>9</b>	<b>66</b>	<b>99</b>	<b>208</b>	<b>853</b>	<b>308</b>	<b>222</b>	<b>1,766</b>
Dwellings with one discount	0	0	0	8	37	37	58	152	44	26	362
Dwellings with two discount	0	0	0	0	1	0	0	2	0	0	3
Dwellings with premium	0	0	0	1	0	1	1	0	2	0	5
Dwellings with no discount or premium	0	0	1	0	28	61	149	699	262	196	1,396
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>9</b>	<b>66</b>	<b>99</b>	<b>208</b>	<b>853</b>	<b>308</b>	<b>222</b>	<b>1,766</b>
Long term premium adjustment	0.00	0.00	0.00	0.50	0.00	0.50	0.50	0.00	1.00	0.00	2.50
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>0.00</b>	<b>1.00</b>	<b>7.50</b>	<b>56.25</b>	<b>90.25</b>	<b>194.00</b>	<b>814.00</b>	<b>298.00</b>	<b>215.50</b>	<b>1,676.50</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	0.00	0.78	6.67	56.25	110.31	280.22	1,356.67	596.00	502.83	2,909.73
Estimated Collection Rate											98.5%
Tax Base											2,866.08

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# CARDIFF COUNCIL COUNCIL TAX BASE CALCULATION FOR 2023/24

APPENDIX C

## PENTYRCH

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	2	95	312	344	445	923	450	175	92	2,838
New properties October 2022- March 2023	0	0	0	15	5	11	3	0	0	0	34
New properties April 2023 - March 2024	0	0	0	3	1	3	6	2	0	0	15
Dwellings per V.O. listing (+ projections)	0	2	95	330	350	459	932	452	175	92	2,887
Exemptions	0	-1	-6	-5	-8	-10	-6	0	-1	0	-37
Chargeable Dwellings	0	1	89	325	342	449	926	452	174	92	2,850
Disablement Relief	0	0	2	8	3	9	5	0	2	0	29
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>3</b>	<b>95</b>	<b>320</b>	<b>348</b>	<b>445</b>	<b>921</b>	<b>454</b>	<b>172</b>	<b>92</b>	<b>2,850</b>
Dwellings with one discount	0	1	58	181	141	118	189	76	23	5	792
Dwellings with two discount	0	0	0	0	1	2	2	1	0	0	6
Dwellings with premium	0	0	1	1	2	0	1	1	0	0	6
Dwellings with no discount or premium	0	2	36	138	204	325	729	376	149	87	2,046
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>3</b>	<b>95</b>	<b>320</b>	<b>348</b>	<b>445</b>	<b>921</b>	<b>454</b>	<b>172</b>	<b>92</b>	<b>2,850</b>
Long term premium adjustment	0.00	0.00	0.50	0.50	1.00	0.00	0.50	0.50	0.00	0.00	3.00
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>2.75</b>	<b>81.00</b>	<b>275.25</b>	<b>313.25</b>	<b>414.50</b>	<b>873.25</b>	<b>435.00</b>	<b>166.25</b>	<b>90.75</b>	<b>2,652.00</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	1.83	63.00	244.67	313.25	506.61	1,261.36	725.00	332.50	211.75	3,659.97
Estimated Collection Rate											98.5%
Tax Base											3,605.07

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**CARDIFF COUNCIL  
COUNCIL TAX BASE CALCULATION FOR 2023/24**

**APPENDIX D**

RADYR

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	0	8	118	360	504	874	858	197	92	3,011
New properties October 2022- March 2023	0	0	0	0	0	8	10	10	0	1	29
New properties April 2023 - March 2024	0	0	0	0	0	6	7	6	0	0	19
Dwellings per V.O. listing (+ projections)	0	0	8	118	360	518	891	874	197	93	3,059
Exemptions	0	0	0	-3	-12	-16	-11	-5	-2	0	-49
Chargeable Dwellings	0	0	8	115	348	502	880	869	195	93	3,010
Disablement Relief	0	0	0	0	8	9	7	5	1	0	30
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>123</b>	<b>349</b>	<b>500</b>	<b>878</b>	<b>865</b>	<b>194</b>	<b>93</b>	<b>3,010</b>
Dwellings with one discount	0	0	5	83	180	182	204	139	25	9	827
Dwellings with two discount	0	0	0	0	1	2	1	3	0	0	7
Dwellings with premium	0	0	0	1	1	2	0	0	0	0	4
Dwellings with no discount or premium	0	0	3	39	167	314	673	723	169	84	2,172
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>123</b>	<b>349</b>	<b>500</b>	<b>878</b>	<b>865</b>	<b>194</b>	<b>93</b>	<b>3,010</b>
Long term premium adjustment	0.00	0.00	0.00	0.50	0.50	1.00	0.00	0.00	0.00	0.00	2.00
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>0.00</b>	<b>6.75</b>	<b>102.75</b>	<b>304.00</b>	<b>454.50</b>	<b>826.50</b>	<b>828.75</b>	<b>187.75</b>	<b>90.75</b>	<b>2,801.75</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	0.00	5.25	91.33	304.00	555.50	1,193.83	1,381.25	375.50	211.75	4,118.41
Estimated Collection Rate											98.5%
Tax Base											4,056.63

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**CARDIFF COUNCIL  
COUNCIL TAX BASE CALCULATION FOR 2023/24**

**APPENDIX E**

**ST. FAGANS**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	1	70	96	242	350	338	272	96	44	1,509
New properties October 2022- March 2023	0	0	0	0	5	21	5	0	0	0	31
New properties April 2023 - March 2024	0	0	0	0	1	16	5	0	0	0	22
Dwellings per V.O. listing (+ projections)	0	1	70	96	248	387	348	272	96	44	1,562
Exemptions	0	-1	-4	-2	-5	-5	-6	-3	0	0	-26
Chargeable Dwellings	0	0	66	94	243	382	342	269	96	44	1,536
Disablement Relief	0	1	1	3	5	4	2	2	0	0	18
<b>Adjusted Chargeable Dwellings Total</b>	<b>1</b>	<b>0</b>	<b>68</b>	<b>96</b>	<b>242</b>	<b>380</b>	<b>342</b>	<b>267</b>	<b>96</b>	<b>44</b>	<b>1,536</b>
Dwellings with one discount	0	0	43	48	65	79	60	40	16	10	361
Dwellings with two discount	0	0	0	0	0	1	2	0	0	1	4
Dwellings with premium	0	0	0	0	0	7	0	1	1	0	9
Dwellings with no discount or premium	1	0	25	48	177	293	280	226	79	33	1,162
<b>Total adjusted chargeable dwellings</b>	<b>1</b>	<b>0</b>	<b>68</b>	<b>96</b>	<b>242</b>	<b>380</b>	<b>342</b>	<b>267</b>	<b>96</b>	<b>44</b>	<b>1,536</b>
Long term premium adjustment	0.00	0.00	0.00	0.00	0.00	3.50	0.00	0.50	0.50	0.00	4.50
<b>Total dwellings including discounts</b>	<b>1.00</b>	<b>0.00</b>	<b>57.25</b>	<b>84.00</b>	<b>225.75</b>	<b>363.25</b>	<b>326.00</b>	<b>257.50</b>	<b>92.50</b>	<b>41.00</b>	<b>1448.25</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.56	0.00	44.53	74.67	225.75	443.97	470.89	429.17	185.00	95.67	1,970.21
Estimated Collection Rate											98.5%
Tax Base											1,940.66

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**CARDIFF COUNCIL  
COUNCIL TAX BASE CALCULATION FOR 2023/24**

**APPENDIX F**

**OLD ST. MELLONS**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	104	158	400	366	433	416	141	80	64	2,162
New properties October 2022- March 2023	0	0	1	10	9	20	20	1	1	0	62
New properties April 2023 - March 2024	0	0	0	5	11	22	22	2	0	2	64
Dwellings per V.O. listing (+ projections)	0	104	159	415	386	475	458	144	81	66	2,288
Exemptions	0	-5	-8	-3	-4	-3	-5	-2	-2	0	-32
Chargeable Dwellings	0	99	151	412	382	472	453	142	79	66	2,256
Disablement Relief	0	1	3	1	3	4	4	0	0	0	16
<b>Adjusted Chargeable Dwellings Total</b>	<b>1</b>	<b>101</b>	<b>149</b>	<b>414</b>	<b>383</b>	<b>472</b>	<b>449</b>	<b>142</b>	<b>79</b>	<b>66</b>	<b>2,256</b>
Dwellings with one discount	0	78	95	213	135	86	59	33	15	11	725
Dwellings with two discount	0	0	0	1	1	1	1	0	0	0	4
Dwellings with premium	0	0	1	0	3	0	0	0	1	1	6
Dwellings with no discount or premium	1	23	53	200	244	385	389	109	63	54	1,521
<b>Total adjusted chargeable dwellings</b>	<b>1</b>	<b>101</b>	<b>149</b>	<b>414</b>	<b>383</b>	<b>472</b>	<b>449</b>	<b>142</b>	<b>79</b>	<b>66</b>	<b>2,256</b>
Long term premium adjustment	0.00	0.00	0.50	0.00	1.50	0.00	0.00	0.00	0.50	0.50	3.00
<b>Total dwellings including discounts</b>	<b>1.00</b>	<b>81.50</b>	<b>125.75</b>	<b>360.25</b>	<b>350.25</b>	<b>450.00</b>	<b>433.75</b>	<b>133.75</b>	<b>75.75</b>	<b>63.75</b>	<b>2,075.75</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.56	54.33	97.81	320.22	350.25	550.00	626.53	222.92	151.50	148.75	2,522.87
Estimated Collection Rate											98.5%
Tax Base											2,485.03

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**CARDIFF COUNCIL**  
**COUNCIL TAX BASE CALCULATION FOR 2023/24**  
**TONGWYNLAIS**

**APPENDIX G**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	1	112	167	198	200	91	47	5	9	830
New properties October 2022- March 2023	0	0	0	0	0	1	1	0	1	0	3
New properties April 2023 - March 2024	0	0	0	0	0	0	0	0	0	0	0
Dwellings per V.O. listing (+ projections)	0	1	112	167	198	201	92	47	6	9	833
Exemptions	0	0	-6	-2	-2	-1	-2	0	0	0	-13
Chargeable Dwellings	0	1	106	165	196	200	90	47	6	9	820
Disablement Relief	0	0	2	2	2	0	0	0	1	0	7
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>3</b>	<b>106</b>	<b>165</b>	<b>194</b>	<b>200</b>	<b>90</b>	<b>48</b>	<b>5</b>	<b>9</b>	<b>820</b>
Dwellings with one discount	0	0	68	71	73	57	17	6	0	1	293
Dwellings with two discount	0	0	0	0	0	0	0	0	0	0	0
Dwellings with premium	0	0	0	0	1	2	0	0	0	0	3
Dwellings with no discount or premium	0	3	38	94	120	141	73	42	5	8	524
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>3</b>	<b>106</b>	<b>165</b>	<b>194</b>	<b>200</b>	<b>90</b>	<b>48</b>	<b>5</b>	<b>9</b>	<b>820</b>
Long term premium adjustment	0.00	0.00	0.00	0.00	0.50	1.00	0.00	0.00	0.00	0.00	1.50
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>3.00</b>	<b>89.00</b>	<b>147.25</b>	<b>176.25</b>	<b>186.75</b>	<b>85.75</b>	<b>46.50</b>	<b>5.00</b>	<b>8.75</b>	<b>748.25</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	2.00	69.22	130.89	176.25	228.25	123.86	77.50	10.00	20.42	838.39
Estimated Collection Rate											98.5%
Tax Base											825.81

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**COUNCIL TAX PREMIUMS****FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR CHRIS WEAVER)****AGENDA ITEM: 13**

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**Reason for this Report**

1. For Cabinet to:
  - Consider the discretionary powers that the Council has to charge higher amounts of Council Tax (a premium) on certain properties provided for by the Housing (Wales) Act 2014.
  - Having regard to these powers, to consider approving a formal period of public consultation on a proposal to both introduce a premium for properties that are occupied periodically and to consider amending the current level of premium for long term empty dwellings.

**Background**

2. The Housing (Wales) Act 2014 amended the Local Government Finance Act 1992 by inserting section 12A which gave the Council the discretion to discontinue any discounts granted to long term empty homes and apply a premium of up to 100% on top of the standard rate of council tax.
3. As a result of this on 29<sup>th</sup> November 2018 the Council resolved to undertake a consultation exercise on the application of a council tax premium on long term empty dwellings. This consultation exercise was completed on 14<sup>th</sup> January 2019.
4. After considering the results of the consultation exercise the Council resolved that with effect from 1<sup>st</sup> April 2019 a 50% council tax premium was applied to long term empty dwellings that had been unoccupied and substantially unfurnished for more than 12 months. Therefore, a council tax charge of 150% is currently made on these properties (a 50% premium plus the 100% standard charge).
5. The Council can make, vary, or revoke a determination made under Section 12A of the 1992 Act, but only before the beginning of the financial year to which the determination applies. Where a determination is made to apply a council tax premium, a local authority must publish a

notice of the determination in at least one newspaper circulating in its area within 21 days of the date of the determination.

6. The Housing (Wales) Act 2014 also amended the Local Government Finance Act 1992 by inserting Section 12B which gave the Council the discretion to apply a premium of up to 100% on top of the standard rate of council tax on properties occupied periodically (for example second homes and unoccupied furnished lets). So far, the Council has not decided to apply a premium on these type of dwellings.
7. If a determination is made under Section 12B then it must be made at least one year before the beginning of the year to which it relates.
8. A premium cannot be charged on a dwelling that falls within an exception class. The Council Tax (Exceptions to Higher Amounts Wales) Regulations 2015 set out the following exceptions –

<b>Class</b>	<b>Definition</b>	<b>Application</b>
Class 1	Dwellings being marketed for sale – time limited for one year.	Second Homes and Long-Term Empty Properties
Class 2	Dwellings being marketed for let – time limited for one year	
Class 3	Annexes forming part of, or being treated as part of, the main dwelling	
Class 4	Dwellings which would be someone's sole or main residence if they were not residing in armed forces accommodation	
Class 5	Occupied caravan pitches and boat moorings	Second Homes
Class 6	Seasonal homes where year-round occupation is prohibited	
Class 7	Job-related dwellings	

9. The Council Tax (Long-term Empty Dwellings and Dwellings Occupied Periodically) (Wales) Regulations 2022 have now further amended Sections 12A and 12B of the Local Government Finance Act 1992 to provide that with effect from 1st April 2023 the Council has the discretion to charge a premium of up to 300% on top of the standard rate of council tax on both properties occupied periodically and long-term empty property.
10. This will enable Councils to decide the level which is appropriate for their individual local circumstances. Councils will be able to set the premium at any level up to the maximum, and they will be able to apply different premiums to properties occupied periodically and long-term empty property.

## **Long term empty dwellings**

11. Many issues of community concern arise from some of the empty properties within the city; these include fly tipping, nuisance, vandalism, criminal activity, and visual deterioration, all of which have the potential to adversely affect neighbouring properties and residents. Some empty properties can be a blight on a local community and boarded up dwellings have a significant impact on the way potential investors perceive an area. In addition to the above, empty properties also represent a wasted resource considering the housing demand within the city. This year's figures show that there are 1232 empty for more than six months at any one time and the Housing enforcement team within the Shared Regulatory Services (SRS) actively monitor 200 of those empty properties on a prioritised basis as part of the Private Sector Empty Homes Policy. Priority is given to problematic empty homes and those vacant for more than 5 years
12. In addition to reactive visits to complaints about empty properties, the SRS also work proactively to capture the wider scope of long-term empty properties. The Council seeks to incentivise owners to act positively in bringing properties into beneficial use in several ways. These include signposting owners to the Houses into Homes loan scheme, providing a list of private property developers, referring to a Housing Association for lease and repair where feasible or providing proof of empty status letters for VAT reduction on renovation costs. Although some owners may be receptive to this approach, there are of course situations where owners are absent and cannot be traced or are resistant to resolving the issues. In these circumstances, the SRS can exercise a number of enforcement powers. These can deal with immediate issues such as fly tipping and making premises secure to more long-term solutions such as enforced sale or compulsory purchase.
13. The number of long-term empty properties that are paying a premium has increased from 732 in April 2019 to 862 at the end of October 2022 which is an indication that the current level of premium may not be sufficient to act as an added incentive to bring properties back into beneficial occupation. Therefore, consideration should be given to whether a higher level of premium should be paid in addition to the current council tax liability.

## **Dwellings occupied periodically**

14. A property that is occupied periodically is defined as a dwelling that is not a person's sole or main residence and is substantially furnished. These dwellings are referred to in the Local Government Finance Act (LGFA) 1992 as dwellings occupied periodically but they include "second homes" and dwellings that are unoccupied between lets.
15. The Council Tax records indicate that at the end of October 2022 there are more than 3,200 of these dwellings in the city. Given the significant number of these type of dwellings they impact upon the available housing

stock in the city. Therefore, consideration should be given to whether a premium should be paid in addition to the current council tax liability.

### **Current charges for long term empty dwellings and periodically occupied dwellings**

16. Dwellings that are occupied periodically are currently charged at the rate of 100% which means that no premium is currently payable on these properties.
17. Long term empty dwellings have been charged 150% since 1<sup>st</sup> April 2019 which is made up of a 50% premium plus the 100% standard council tax charge.

### **Proposal to increase the rate of premium for long term empty dwellings and to charge a premium on dwellings that are occupied periodically**

18. The Council is committed to minimising the number of empty properties that exist in view of the housing demand within the city and the impact that some empty properties have upon the local community.
19. To seek to achieve this it is proposed that the premium rate for long term empty dwellings is increased from 50% to 100% from 1<sup>st</sup> April 2023. This means that the charge on dwellings that are unoccupied and substantially unfurnished for more than 12 months will increase from 150% to 200% with effect from 1<sup>st</sup> April 2023.
20. It is also proposed that a premium of 100% is charged on dwellings that are occupied periodically (second homes and unoccupied furnished lets etc) with effect from 1<sup>st</sup> April 2024. To apply this premium the Council must give at least one year's notice. This means that the charge for dwellings that are occupied periodically will increase from 100% to 200% with effect from 1<sup>st</sup> April 2024.

### **Consultation**

21. The determination by a local authority to charge a premium must be made by full Council. Prior to doing so a local authority must give due consideration to its statutory duties to carry out equality impact assessments under the Equality Act 2010 and the Welsh Public Sector Equality Duties 2011 and to all other relevant considerations. The Welsh Government has also stated that a Council should consider engagement and consultation with key stake holders, including the local electorate, before taking a decision as to whether or not to charge a premium.
22. The consultation would be open to all stakeholders with appropriate coverage on both the website and Council buildings such as hubs and libraries.

## **Reason for Recommendations**

23. The discretion given to Council's to charge a premium is intended to be a tool to help local authorities to:

Bring long-term empty homes back into use to provide safe, secure and affordable homes; and

Support Council's in increasing the supply of affordable housing and enhancing the sustainability of local communities.

24. It is also necessary for the Cabinet and Council to consider the discretionary powers that are available in relation to applying Council Tax premiums.

## **Financial Implications**

25. The report recommends that a consultation be commenced in respect of increasing the Council Tax premium on long term empty dwellings from 50% to 100% from 1 April 2023, and to introduce a 100% premium on periodically occupied properties from 1 April 2024. Full financial impact will ultimately depend on the outcome of consultation and subsequent recommendations.

26. Local authorities are permitted to retain any additional funds generated through Council Tax premiums, although the Welsh Government encourages the use of any additional revenue generated to help meet local housing needs. In implementing or extending premiums, the additional cost of administration and recovery is an important consideration in determining the overall net financial benefit.

27. If the current unoccupied and unfurnished premium is increased to 100% with effect from 1<sup>st</sup> April 2023, a prudent estimate of additional income generated before any incremental administration costs, is £300k. Further work is required to estimate the likely income in 2024/25 if a new premium is implemented for vacant furnished dwellings.

## **Legal Implications**

28. Legal Implications appear throughout the text of this Report.

29. If a decision is made to adopt a Council Tax Premium, then an Equality Impact Assessment will need to be carried out.

30. All decisions taken by or on behalf of the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the

Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

### **HR Implications**

31. There are no HR implications associated with this report.

### **Property Implications**

32. There are no immediate property implications arising from the recommendations of this report. Subject to approval, the exercise should consider the impact on empty residential properties which may owned by the Council.

## **RECOMMENDATIONS**

Cabinet is recommended to

- (1) Note the information in respect of the discretionary powers relating to Council Tax Premiums as outlined in this report.
- (2) Approve the undertaking of a consultation exercise on the application of a Council Tax Premium for periodically occupied dwellings and increasing the level of premium for long term empty dwellings.
- (3) Note that the results of the consultation exercise will inform a final decision to be taken at Council early in 2023.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Chris Lee</b> <b>Corporate Director Resources</b>
	9 December 2022

**LOCAL BROADBAND FUND – IMPROVING CONNECTIVITY TO POORLY SERVED PREMISES**

**FINANCE, MODERNISATION & PERFORMANCE (COUNCILLOR CHRISTOPHER WEAVER)**

**AGENDA ITEM:14**

**Reason for this Report**

1. To obtain Cabinet approval to accept the grant funding award from Welsh Government for the delivery of gigabit capable fibre broadband to areas which are currently poorly served by the commercial marketplace and gain approval to progress with the procurement for its delivery.

**Background**

2. Cardiff is many things to many people. It is a place of work, a place of entertainment, events and social interaction, a place of learning and a place of home. All of equal importance, they have a common underlying need. That is one of future proof digital connectivity.
3. High speed connectivity will support the growth of new technologies such as telehealth solutions, mobile entertainment, virtual reality, augmented reality, virtual learning environments and, in a post-pandemic world, new ways of working. It is important that Cardiff is ready for a future that ensures our businesses and citizens reap the benefits of fast connectivity.
4. The Council is currently developing its Replacement Local Development Plan, the new (2021-2036) Draft Vision, Issues and Objectives, as the precursor to the preferred Strategy outlines the scale of growth forecast and challenges ahead to 2036. It highlights the many issues which we face and identifies the timely provision of new infrastructure as being key to support future growth, specifically supporting measures to improve digital connectivity across the City.

**Connectivity across the City**

5. In 2020 UK Government set a target of achieving nationwide gigabit broadband to be available by 2030, with 85% of premises to be reached by 2025. The remaining 15% of premises being the hardest to reach, to be

reached between 2025 and 2030. Whilst they committed to investing £5billion to subsidise the roll-out across the whole Country, telecommunications is a reserved matter and as such, a formal role was assigned to the devolved administrations to organise and manage broadband roll-out in their regions.

6. There are 190,305 premises within the Cardiff boundary. This figure is increasing with the Capital forecast to grow by up to 30,000 residential properties alone over the next 15 years.
7. At present, over 98%<sup>1</sup> of premises across the city have access to broadband speeds of over 30M/bits per second predominantly via a traditional copper network fed from cabinets installed on-street (known as Fibre-to-the-Cabinet (FTTC)). The newer gigabit capable services are delivered by a direct Fibre-to-the-Premise (FTTP) line with links directly to the premise, bypassing the cabinet and comprises fibre-optic lines as opposed to copper.
8. Currently, 55%<sup>2</sup> of premises in Cardiff have access to Full Fibre (FTTP) services, in comparison to 37%<sup>3</sup> across the whole of the UK. Cardiff is committed to ensuring that full fibre connectivity is available across the city, without exception. First and foremost, it is working with the marketplace to aid with smooth and swift roll-out of commercial plans by suppliers as this is the preferred route for delivery and lessens the burden on the public purse.
9. Where areas have been identified as not being included within the existing commercial plans, Council officers have been proactive in identifying alternative ways and committing resource to address this, This includes processing and granting of Wayleaves which will permit access to Council estate to act as a conduit to reaching premises, or co-ordinating with works on the Highway to allow for excavations whilst minimising the impact and disruption to the public and the operation of the City. This is in order to encourage providers into areas which were not originally identified for coverage. However, there still remains a gap between the premises included in commercial roll-out plans and those outside of those plans.

### **How We Will Address the Disparity**

10. In December 2021, the Council submitted a bid into the Welsh Government Local Broadband Fund for funding to address areas of the City identified as receiving poor broadband services. The areas put forward were identified as not planned or programmed to be addressed by the commercial marketplace in the next 3 years. As such, those premises would fall behind other parts of the city in being able to access the various services available online, many of which enable our citizens and businesses to grow.

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<sup>1</sup> Ofcom Connected Nations Autumn 2022 update

<sup>2</sup> Ofcom Connected Nations Autumn 2022 update

<sup>3</sup> Ofcom Connected Nations Autumn 2022 update



11. In March 2022, the Council was notified that it was successful in its bid for £7.7 million across 3 financial years, 2022-23, 2023-24 and 2024-25. As such, this project will provide Gigabit capable, Full Fibre to the Premise connections to those sites identified as being at risk of being left behind.
12. Of the 190,000 premises within the city, approximately 20,000 are identified as lying outside plans of the commercial providers for gigabit service roll-out by 2025 and so are at risk of being excluded.
13. The approach taken is that first and foremost, we will seek to address premises identified as high on the Welsh Index of Multiple Deprivation (WIMD). This Index is the Welsh Government's official measure of relative deprivation and uses various markers such as income, employment, health, education, community safety, housing, access to services and physical environment to rank areas in order from most to least deprived. A secondary consideration is the existing roll-out plans of the marketplace and maximising benefits and cost savings of a co-ordinated approach in aligning the delivery of premises identified in this project with those plans.
14. At this stage, it is not known exactly how many of the 20,000 premises the financial allocation of £7.7million will address. It is proposed that a procurement will be carried out via an existing Crown Commercial Service Framework, specifically for the delivery of gigabit capable fibre broadband infrastructure. The procurement process will seek to achieve best value and maximum coverage of the premises identified.

### **Wider Context**

15. The project is closely aligned with the outcomes from published Council plans and strategies such as the Stronger, Fairer, Greener Agenda, City Recovery Strategy, Digital Strategy and Smart City Roadmap. It has been designed to add value and 'bridge gaps' to existing service provision.
16. It is also aligned with UK and Welsh Government strategies in the drive for Full Fibre provision to reach at least 85% of UK premises by the end of 2025, and nationwide coverage (c. 99%) by 2030. In its Digital Strategy, the Dept for Digital, Culture, Media and Sport reinforces the importance of a robust digital infrastructure, whilst the Welsh Government acknowledges the essential role of a good quality digital infrastructure upon which we can grow.
17. Cities around the world continue to face the challenges in the aftermath of the COVID-19 pandemic. A significant number of people continue to work from home and so access to a good quality, reliable broadband service is now considered to be a minimum requirement. Indeed, there have long been calls for designating broadband as the 4th essential utility.
18. This project will deliver fibre connectivity to residents, businesses, community facilities and service providers. It is widely acknowledged that high quality, future-proof fibre-based connectivity can help tackle the challenges that our city faces. Using fibre broadband to help deliver technological advances in environmental, financial and social aspects of

urban life, our citizens can leverage technology to create more efficient and effective services, collaborate and engage widely, all of which will improve outcomes for our citizens.

19. Such investment in our digital infrastructure will enable the city to attract leading tech and media companies, to sustain economic growth and to remain competitive in the future.
20. The 'Cardiff of the future' will look very different and bring new challenges and opportunities – increased population, new employment opportunities, increased demand on energy, improved connectivity, better transport links and new innovative technologies will change the way people work, visit and live in the Capital. A core fibre-based network will be the bedrock upon which technological growth can flourish.

### **Sharing Best Practice**

21. Cardiff Council has engaged with fellow Local Authorities to discuss best practise and to share lessons learned in our approach.
22. Carmarthenshire, with 98,000 premises is seeking to address 23,000 sites at risk of being left behind.
23. Powys Council, with 76,000 premises is seeking to address 26,000 sites.
24. Both are seeking to undertake a similar project and are following closely behind Cardiff and so we provide guidance, support and shared knowledge gained on our methodology and delivery mechanism.

### **The Way Forward**

25. The Council's Chief Digital Officer leads on digital connectivity and ensuring that the city benefits from access to future-proof, fibre-based services. However, it is acknowledged that in order to achieve this, it will involve cross-departmental working within the Council. Collaborative working both within, and with external organisations is essential for the roll-out of fibre broadband to be successfully delivered.
26. In doing so, we will build on the foundations of Cardiff's aspirations to become a digital city where our citizens and businesses can grow and thrive. It will enable our learners to achieve the Welsh Government's new digital literacy competencies objectives by providing better access to online content. It will give greater access to Council services to the public via the growing number of online platforms we now offer, from online payments and school admissions, to waste enquiries and web chat with our virtual Chatbot Bobi, which can assist 24/7, 365 days of the year.
27. The next step is to gain approval from Cabinet to commence the delivery of the project which will enable officers to undertake a formal procurement process for the provision of fibre broadband. Funding is allocated in the current financial year to commence the project and could see premises begin to access a gigabit capable service relatively swiftly.

## **Reason for Recommendations**

28. Approval to accept the grant funding award of £7.7million from the Welsh Government Local Broadband Fund will enable the Council to address those premises identified which will remain unserved by the commercial providers and which are therefore at risk of falling behind on the roll-out of full fibre provision and the services it enables. Access to gigabit-capable full fibre broadband can help drive economic development and improve environmental, financial and social aspects of urban life.

## **Financial Implications**

29. There are no direct financial implications of this report to the Council as the intention is that all expenditure incurred would be claimed back from the approved Welsh Government allocation. However, the stated aim is to address broadband issues affecting 20,000 properties across the city. The report acknowledges that, until such time as the tender process has been undertaken, it is not known what proportion of that figure can actually be addressed with the £7.7 million that has been allocated. As such, any contract should be limited to the allotted amount, and should not expose the Council to a financial commitment over and above that figure.
30. The stated allocation is £7.7m over three financial years, and, whilst the service appears to have received assurance from Welsh Government that the profile of spend is flexible over the three years, it is unlikely that work would start prior to the beginning of year 2 (2023/24) given the procurement process is yet to be undertaken. Assurance should therefore be sought that any unclaimed allocation as at the end of the third year may be “slipped” into a fourth year to allow completion of the project. It is understood that this project represents one phase of the Welsh Government initiative and that any additional phases would be subject to further bids.

## **Legal Implications**

31. Legal Services advise that terms of and conditions of the grant award are read, understood and can be adhered to by the Council. A failure to comply with the grant terms and conditions may sometimes result in funding being withdrawn with some or all of the funding becoming repayable.
32. Legal Services believe that when this grant results in procurements regard must be had to the terms of the grant agreement as these may contain stipulations of what the grant sums may be used for it may contain details of match funding requirements. During the procurement process Procurement Legislation, (Public Contracts Regulations 2015) and other relevant legislation must be adhered to as well as following the Council’s Constitution, the CPR (Contract Procedure Rules) and all other relevant internal council processes.
33. Legal Services would advise that the Council procure services in an open and transparent process and comply with the rules on subsidies, (formerly State Aid). Accordingly, the Directorate should have regard to the

Council's procurement rules and satisfy themselves as to compliance the current Subsidy rules.

34. The decision maker should have regard to the following points in making their decision regarding this matter:

1. Detailed legal advice should be obtained throughout the procurement process with regard to the procurement process generally, (including the draft terms and conditions of contract). The decision maker should be satisfied that the procurement is in accordance within the financial and budgetary policy and represents value for money for the council.

2. Equalities Impact Assessment/public duties:

The Council has to satisfy its public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties) – the Public Sector Equality Duties (PSED). These duties require the Council to have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of 'protected characteristics'. The 'Protected characteristics' are: • Age • Gender reassignment • Sex • Race – including ethnic or national origin, colour or nationality • Disability • Pregnancy and maternity • Marriage and civil partnership • Sexual orientation • Religion or belief – including lack of belief.

Consideration should be given to the requirements to carry out Equality Impact Assessments ('EIA') so that the decision maker may understand the potential impacts of the proposals in terms of equality. This will assist the decision maker to ensure that it is making proportionate and rational decisions having due regard to the public sector equality duty.

Where a decision is likely to result in a detrimental impact on any group sharing a Protected Characteristic, consideration must be given to possible ways to mitigate the harm. If the harm cannot be avoided, the decision maker must balance the detrimental impact against the strength of the legitimate public need to pursue the recommended approach. The decision maker must be satisfied that having regard to all the relevant circumstances and the PSED, the proposals can be justified, and that all reasonable efforts have been made to mitigate the harm.

3. Well-Being of Future Generations (Wales) Act 2015:

The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.

In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan 2019-22. When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the

proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.

The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:

- Look to the long term
- Focus on prevention by understanding the root causes of problems
- Deliver an integrated approach to achieving the 7 national well-being goals
- Work in collaboration with others to find shared sustainable solutions
- Involve people from all sections of the community in the decisions which affect them

The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### **HR Implications**

35. The funding awarded includes for a temporary Project Manager role to be appointed to assist with the delivery of the project. The post will be in place for the duration of the project. The evaluation, creation and recruitment to this post will be compliant with corporately agreed processes and procedures.

### **Property Implications**

36. Any property matters relevant to land and property assets that result from the implementation of the scheme should be managed through the agreed Council asset management and legal processes.

## **RECOMMENDATIONS**

Cabinet is recommended to

1. accept the funding awarded to Cardiff Council by Welsh Government for the roll-out of gigabit capable fibre broadband to premises identified as outside commercial roll-out plans for the next 3 years.
2. delegate to the Chief Digital Officer in consultation with the Cabinet Member for Finance, Modernisation and Performance authority to deal

with all aspects of the procurement process and ancillary matters up to and including award of contract.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Isabelle Bignall</b> <b>Chief Digital Officer</b>
	9 December 2022

*The following appendices are attached:*

Appendix A – Single Impact Assessment which includes Equality Impact Assessment

# Cardiff Council Single Impact Assessment



## 1. Details of the Proposal

**What is the proposal?**

Title: Local Broadband Fund – Improving Connectivity to Poorly Served Premises

**Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?**

New

Existing

**Directorate/Service Area:**

Resources, Digital & Customer Services

**Who is developing the proposal?**

Name: Mandy Evans

Job Title: Enterprise Architect

**Responsible Lead Officer (Director or Assistant Director):**

Isabelle Bignall – Chief Digital Officer

**Cabinet Portfolio:**

Finance, Modernisation & Performance (Councillor Christopher Weaver)

The Single Impact Assessment (SIA) can be strengthened as time progresses, helping shape the proposal. Version control will provide a useful audit trail of how the SIA has developed. Draft versions of the assessment should be retained for completeness, however only the final version will be publicly available. Draft versions may be provided to regulators if appropriate.

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022

## 2. Overview of the Proposal

### What action is the Council considering and why?

*Please provide an outline of the proposal.*

The project will deliver gigabit capable fibre broadband to premises in Cardiff which are identified by the commercial marketplace as being excluded from their roll-out plans over the next 3 years.

Currently, 39% of premises in Cardiff have access to a Full Fibre services, in comparison to 42% across the whole of the UK. Cardiff is committed to ensuring that full fibre connectivity is available across the city and as such, bid to Welsh Government for funding to address those premises being excluded.

The Council was successful in its bid and has been awarded £7.7million to undertake this project.

This will ensure that our citizens and businesses will be able to access those online services which will help them develop and grow. It will enable our learners to access greater online content, which will meet their educational needs and will give greater access to our services to the public via the growing number of online platforms we now offer, from online payments and school admissions, to waste enquiries and web chat with our virtual Chatbot Bobi, which can assist 24/7, 365 days of the year.

### What are the costs and/or savings?

*What will the proposal cost and how will it be funded?*

*How might costs be reduced through involvement and collaboration, across Cardiff Council and/or with external stakeholders?*

*Are there savings and how will these be realised?*

The project has been awarded a Grant of £7.7million over 3 financial years (2022-23/ 2023-24 / 2024-25).

There are a total of 20,251 premises which are identified as outside commercial roll-out plans. At this stage, it is not known exactly how many of those premises the financial allocation of £7.7million will address. It is proposed that a procurement will be carried out via an existing Crown Commercial Service Framework, specifically for the delivery of



gigabit capable fibre broadband infrastructure. The procurement process will seek to achieve best value and maximum coverage of the premises identified. In addition, the project will seek to align with existing roll-out plans of the marketplace and maximising benefits and cost savings of a co-ordinated approach in aligning the delivery of premises identified in this project with those plans.

### 3. Impact Assessments

Which impact assessments do you need to complete to support your proposal?

Impact Assessment	Page	To be completed: Y/N
A. Equality Impact Assessment	4	Y
B. Child Rights Impact Assessment	10	N
C. Welsh Language Impact Assessment	13	N
D. Habitats Regulations Assessment	18	N
E. Strategic Environmental Assessment	19	N
F. Data Protection Impact Assessment	20	N
G. Health Impact Assessment	21	N

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact [positive/negative]** on younger/older people?

	Yes	No	N/A
Up to 18 years		X	
18 - 65 years		X	
Over 65 years		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

### Disability

Will this proposal have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment		X	
Physical Impairment		X	
Visual Impairment		X	
Learning Disability		X	
Long-Standing Illness or Health Condition		X	
Mental Health		X	
Substance Misuse		X	
Other		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

### Gender Reassignment

Will this proposal have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

### Marriage and Civil Partnership

Will this proposal have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage		X	
Civil Partnership		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

### Pregnancy and Maternity

Will this proposal have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy		X	
Maternity		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

**Race**

Will this proposal have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		X	
Mixed / Multiple Ethnic Groups		X	
Asian / Asian British		X	
Black / African / Caribbean / Black British		X	
Other Ethnic Groups		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

**Religion, Belief or Non-Belief**

Will this proposal have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		X	
Christian		X	
Hindu		X	
Humanist		X	
Jewish		X	
Muslim		X	
Sikh		X	
Other		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

**Sex**

Will this proposal have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men		X	
Women		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

**Sexual Orientation**

Will this proposal have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		X	
Gay Men		X	
Gay Women/Lesbians		X	
Heterosexual/Straight		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not believed the project will result in any differential impact

**What action(s) can you take to address the differential impact?**

N/A

### Socio-economic Duty

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas)

	Yes	No	N/A
Socio-economic impact	X		

#### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The approach taken is that first and foremost, we will seek to address premises identified as high on the Welsh Index of Multiple Deprivation (WIMD). This Index is the Welsh Government's official measure of relative deprivation and uses various markers such as income, employment, health, education, community safety, housing, access to services and physical environment to rank areas in order from most to least deprived.

#### What action(s) can you take to address the differential impact?

The project will seek to provide positive impact to those premises identified in areas classified as high on the Welsh Index of Multiple Deprivation

### Welsh Language

Will this proposal have a **differential impact [positive/negative]** on the Welsh language?

	Yes	No	N/A
Welsh language		X	

#### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not believed the project will result in any differential impact

#### What action(s) can you take to address the differential impact?

N/A

### Consultation and Engagement

What arrangements have been made to consult/engage with the various equalities groups?

At the early stages of the project, work was undertaken to identify those premises high on the Welsh Index of Multiple Deprivation in order to seek to prioritise those areas first and foremost, with the funding allocated. As the project progresses, greater engagement will be undertaken when there is greater surety around those premises progressing to the deliver stage.

### Summary of Actions (Listed in the sections above)

	<b>Actions</b>
Age	None
Disability	None
Gender Reassignment	None
Marriage & Civil Partnership	None
Pregnancy & Maternity	None
Race	None
Religion/Belief	None
Sex	None
Sexual Orientation	None
Socio-economic Impact	When the procurement process has commenced and tender returns are received, this will identify the site being addressed. It is at this point that we will be able to engage directly with those impacted.
Welsh Language	None
Generic/ Over-Arching (applicable to all the above groups)	The project has positive impact across all groups

### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

On completion of this Assessment, please ensure that the form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council  
[EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

## B: Child Rights Impact Assessment

Guidance for Local Government prepared from Unicef is available here:

[Child Rights Impact Assessment - Child Friendly Cities & Communities \(unicef.org.uk\)](https://www.unicef.org.uk/child-rights-impact-assessment)

For further information or assistance in completing the Child Rights Impact Assessment, please contact the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

### STAGE 1: PURPOSE/ SCOPE

**What is the policy/ strategy/ project/ procedure/ service? Summarise/ describe its overall aims and any aims specific to children.**

The project will deliver gigabit capable fibre broadband to premises in Cardiff which are identified by the commercial marketplace as being excluded from their roll-out plans over the next 3 years.

Currently, 39% of premises in Cardiff have access to a Full Fibre services, in comparison to 42% across the whole of the UK. Cardiff is committed to ensuring that full fibre connectivity is available across the city and as such, bid to Welsh Government for funding to address those premises being excluded.

The Council was successful in its bid and has been awarded £7.7million to undertake this project.

This will ensure that our citizens and businesses will be able to access those online services which will help them develop and grow. It will enable our learners to access greater online content, which will meet their educational needs and will give greater access to our services to the public via the growing number of online platforms we now offer, from online payments and school admissions, to waste enquiries and web chat with our virtual Chatbot Bobi, which can assist 24/7, 365 days of the year.

**Will the policy/ strategy/ project/ procedure/ service affect children and young people? Please think about which groups of children and young people it will affect.**

The project delivers to premises and not specific groups and therefore does not target children or young people specifically.

They will benefit in general terms in facilitating access to online content which may assist with their development and the opportunities which are open to them.

### STAGE 2: BUILD AND ASSESS

**Which UNCRC (United Nations Convention on the Rights of the Child) articles are relevant to the policy/ strategy/ project/ procedure/ service? Read the articles [here](#) and add any relevant ones to the table below.**

*The articles which form the four General Principles of the UNCRC are pre-populated in the table.*

*For further information or assistance on UNCRC Articles, please email the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)*



**Article 2 (non-discrimination):** 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 (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.

**Article 17 (access to information from the media)** Every child has the right to reliable information from a variety of sources

**What is the likely/ actual impact of the proposal on children’s rights? Is it positive, negative or neutral?**

*(If a negative impact is assessed for any area of rights or any group of children and young people, you must list and recommend options to modify the proposal or mitigate the impact.)*

Neutral

### STAGE 3: VOICE AND EVIDENCE

**Have you sourced and included the views and experiences of children and young people? What do you know about children and young people’s views and experiences that are relevant to the proposal?**

Engagement with stakeholder groups will be undertaken closer to the deliver stage. At the very early stages of the project, where the project roll-out is not known, it would be abortive to undertake such engagement as this may change over time.

**How do you plan to review the policy/ strategy/ project/ procedure/ service to ensure that it respects, protects and fulfils children’s rights?**

*Please provide an outline of the monitoring and review process for the implementation and/or delivery of the proposal and how children and young people will be included in this process.*

Working with the supplier, we will engage with stakeholders on roll-out plans and programmes. This is not specific to but will include groups representing children.

#### STAGE 4: BUDGET

**What is the budget for this proposal? Are any parts of it specifically allocated to children and young people?**

The financial allocation is £7.7million.  
There is no specific funding relating to children and young people. The funding relates to infrastructure delivery.

#### STAGE 5: IDENTIFIED ACTIONS

**What actions have been identified or changes made to the proposal as a result of this assessment?**

None are required

#### Next Steps

Where it is considered that a Child Rights Impact Assessment is required, you must append the completed form to the Cabinet or Officer Decision Report. A copy must also be emailed to the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

# C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## Welsh Language Standards 88-97

### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?		X	
Treating the Welsh language no less favourably than the English language?		X	

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

**Standard 90**

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

**The opportunities for persons to use the Welsh language?**

--

**Treating the Welsh language no less favourably than the English language?**

--

**Standard 91**

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

**The opportunities for persons to use the Welsh language?**

--

**Treating the Welsh language no less favourably than the English language?**

--

**Standard 92**

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

--

**Treating the Welsh language no less favourably than the English language?**

--

**Standard 93**

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>

<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 94**

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council’s Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

<b>The opportunities for persons to use the Welsh language?</b>

<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 95**

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>

<b>Treating the Welsh language no less favourably than the English language?</b>

## Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

The opportunities for persons to use the Welsh language?

Treating the Welsh language no less favourably than the English language?

## Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?

Treating the Welsh language no less favourably than the English language?

## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

- [Correspondence](#) - receiving and replying (emails, letters, online communication).
- [Telephone](#) – receiving and answering calls.
- [Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.
- [Public Messages – electronic – video](#)
- [Signs, Notices & Display Material](#)
- [Publicity & Advertising](#)
- [Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.
- [Producing Forms](#)

- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

**Are all supporting materials and services compliant with the requirements of the Welsh language standards?**

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### **Cardiff Council's Welsh Language Skills Strategy**

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

**Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?**

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### **Next Steps**

Where it is considered that a Welsh Language Impact Assessment is required, you must append the completed form to the Cabinet or Officer Decision Report. A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## D: Habitats Regulations Assessment

	Yes	No
Will the proposal affect a European site designated for its nature conservation interest*, or steer development towards an area that includes a European site, or indirectly affect a European site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*\* Only two European sites designated for nature conservation interest lie within Cardiff's boundaries – the Severn Estuary and Cardiff Beech Woods, but be aware if your project affects an area close to a neighbouring authority.*

If the answer is 'Yes', then a screening exercise may need to be conducted to determine if a Habitats Regulations Assessment is required or not.

Contact the [Biodiversity Team](#) who will guide you through the process.



## E: Strategic Environmental Assessment

	Yes	No
Does the strategy, policy or activity set the framework for future development consent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Is the strategy, policy or activity likely to have significant environmental effects (positive or negative)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered 'Yes' to both of the above questions, then a full Strategic Environmental Assessment Screening is needed.

Contact the [Sustainable Development Unit](#) who will guide you through the process.

## F: Data Protection Impact Assessment

	Yes	No
Will the proposal involve processing information that could be used to identify individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer is 'Yes', then a Data Protection Impact Assessment may be required.

Click [here](#) to read the guidance and start the Data Protection Impact Assessment process if needed.

For further information, contact the [Data Protection Service](#).

## G: Health Impact Assessment

A Health Impact Assessment helps to develop policies and projects that consider the mental, physical and social health and well-being of a population during planning and development. Considering health inequalities and their impacts on local communities is an essential part of any Health Impact Assessment.

Health Impact Assessments will become a statutory requirement for public bodies in specific circumstances in the future. These circumstances have yet to be published by Welsh Government.

For further information and advice, please contact the Wales HIA Support Unit.

Website: [Home - Wales Health Impact Assessment Support Unit \(phwwhocc.co.uk\)](http://phwwhocc.co.uk)

Email: [WHIASU.PublicHealthWales@wales.nhs.uk](mailto:WHIASU.PublicHealthWales@wales.nhs.uk)

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