

Equality, Diversity, Cohesion and Integration Impact Assessment



As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

Directorate: Children's Services	Service area: Employment and Skills
Lead person: Michelle Anderson	Contact number: 0113 24 78424
Date of the equality, diversity, cohesion and integration impact assessment: 30 March 2016	

1. Title: Waive Contract Procedure Rules 3.1.23 and 15.2 in relation to the European Structural and Investment Fund Back to Work Programme.

Is this a:

Strategy /Policy

Service / Function

Other

If other, please specify: Approve the criteria for evaluation and the waiver of contract procedure rules 3.1.23 and 15.2 to permit evaluation primarily on quality and to allow the Council to undertake post tender negotiations.

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Michelle Anderson	Leeds City Council	Head of Projects & Programmes
Chris Towing	Leeds City Council	Projects & Programmes Senior Manager
Craig Skinner	Leeds City Council	Projects & Programmes Senior Manager

3. Summary of strategy, policy, service or function that was assessed:

The assessment relates to the procurement of delivery services from the restricted framework of potential providers, who had previously tendered an expression of interest to deliver Leeds and Bradford B2W Programme during the bid phase (and in accordance with the DWP's bidding criteria). If the Council's bid is successful, approval to award contracts will be sought by the Executive Board in June 2016 for Leeds City Council to enter into a contract with the Department for Work and Pension (DWP) to deliver the Back to Work Programme over the next three years (2016-2019) across the Leeds and Bradford districts. The provision will focus on a package of tailored support to address worklessness among specific individuals who are unemployed and have additional barriers or needs impacting on their ability to move into employment. The DWP has predetermined the eligible priority groups that can be supported under this programme in consultation with the Leeds City Region Local Enterprise Partnership (LCRLEP).

4. Scope of the equality, diversity, cohesion and integration impact assessment

(complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

4a. Strategy, policy or plan

(please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>

Please provide detail:

4b. Service, function, event

please tick the appropriate box below

The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input type="checkbox"/>
Procuring of a service (by contract or grant)	<input checked="" type="checkbox"/>

Please provide detail:

In March 2016, the Council's Employment and Skills Service led on a joint bid with the City of Bradford Metropolitan District Council (CBMDC) to deliver the Back to Work (B2W) Programme across both districts. B2W forms part of the wider Leeds City Region (LCR) ESIF Strategy which runs from 2014-2020 with expenditure continuing until 2023.

Delivered over three years, the provision will support particular priority groups who are 16 years and over, unemployed or economically inactive and with additional barriers impacting on their ability to move into work e.g. people with mild to moderate mental health issues and young people leaving care.

If the Council bid is successful, in June, the DWP will announce their intention to award a contract to the Council to deliver the Leeds and Bradford B2W Programme. Subject to approval by Executive Board on 22 June 2016 and delivery must begin in September, primarily through subcontractors working across one or both districts.

This equality impact assessment relates specifically to the Contract Procedure Rules (CPR) waivers required as part of the procurement of those subcontractors from the restricted framework created during the original DWP bid phase. The CPR waivers are:

- the evaluation criteria attached at Confidential Appendix A, in accordance with Contract Procurement Rule (CPR) 15.1 which requires "*evaluation criteria to be pre-determined and approved by the relevant Chief Officer*"
- waive CPR 15.2 requirement for 40% evaluation on the price element and permit the quality evaluation criteria to be raised to 100%. which requires approval (*as a significant operational decision under CPR 27*) by the relevant Chief Officer.
- waive CPR 3.1.23 to permit post tender negotiations with providers in order to ensure a balanced programme of provision is achieved for the duration of the framework which requires approval (*as a significant operational decision under CPR 27*) by the relevant Chief Officer.

5. Fact finding – what do we already know

Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.
(priority should be given to equality, diversity, cohesion and integration related information).

What we already know

Local intelligence supported by regional and local data has been relied upon by the DWP as part of the development of the specification and the predetermination of the priority groups. This information has also been used to support this assessment. Key findings are:

Leeds and Bradford have a combined population of 1.3 million people. 833,000 (64.7%) are of working age, a higher proportion than in England as a whole (63.8%). The

employment rate is higher in **Leeds (68.9%)** than in Bradford (65.3%), but in both areas the employment rate is some way below the national average of 72.5%. In March 2015, there were 26,400 Jobseekers Allowance (JSA) claimants in Leeds and Bradford, 5.4% of the working age population. The rate is higher in Bradford (3.6%) than in **Leeds (2.9%)** though both are higher than the national average.

The most **deprived wards in Leeds** are those to the south and east of the city centre, though there are areas of deprivation across the city. In Gipton & Harehills, 81.6% of people live in the 10% most deprived areas in England, whilst in Middleton Park the figure is 69.6% and in Burmantofts and Richmond Hill it is 66.5%. The number of people educated to degree level (NVQ level 4 or higher) has been rising in Leeds and Bradford, with 31% with degree-level qualifications (**34.2% in Leeds**). However, the proportion with this level of qualification remains below the 36% seen in the UK.

Average pay is also below the UK-wide level – **gross weekly earnings in Leeds are similar to the UK level (95%)**, though in Bradford wages are around 88% of the national rate. Both areas have also seen strong growth in entry level jobs across certain sectors including **business administration which grew by 19% in Leeds** and, transport and storage growing at a similar pace in Bradford.

Looking forward

Individual projects under ESIF must also address gender and diversity issues and, for certain calls (bids), will have to set specific targets for participation of priority groups including women and BAME as an integral part of delivery. This is particular relevant for provision funded under the European Social Fund (ESF) element of ESIF, which includes the B2W Programme. The Council will ensure that all subcontractors take action to support ESF cross cutting themes of Gender Equality and Equal Opportunities. This will include:

- maintain an equality policy, training plans and provider diversity plan;
- ensure that a discrimination complaints procedure is in place;
- ensure an equal opportunities policy is in place for participants and staff including any key workers;
- ensure buildings including outreach centres comply with the Equality Act 2010 and;
- support and be involved in equality impact assessments undertaken

As part of the delivery of the programme, equality monitoring will also form a key element of the robust contract management procedures by the Delivery Partner, Maximus UK Limited and within the Council's Employment and Skills Service.

Should the Council bid for funding be successful, provision will be delivered by providers chosen from the restricted framework of potential providers, who had previously tendered an expression of interest to deliver Leeds and Bradford B2W Programme during the bid phase (and in accordance with the DWP's bidding criteria). If the Council's bid is successful,

Are there any gaps in equality and diversity information

Please provide detail: Not known at this stage.

Action required: Not applicable at this stage.

6. Wider involvement – have you involved groups of people who are most likely to be affected or interested

Yes

No

Please provide detail:

A range of intelligence gathered has strongly influenced the design, content, delivery model, outcomes and targets for the Leeds/Bradford B2W Programme.

This includes specific stakeholder events (leading up to bid submission and hosted by the local authorities) helping to identify potential delivery partners and sub-contractors and ensure responsive and locally designed provision. Events were held in October 2015 and February 2016 and included representatives from the public, third and private sector across both Leeds and Bradford and Elected Members. Targeting people with mental health problems was highlighted as a priority from this event along with supporting ex-offenders, young people (including care leavers) and migrants.

Direct engagement with other statutory services within each authority has also informed this delivery model. In Leeds this includes engagement with Public Health re: housing support needs; Adult Social Care re: people with mild to moderate mental health issues; and Safeguarding Specialists and Targeted Services relating to young care leavers. Additional intelligence has also been collated from partners delivering regional and local employability and skills programmes including: Jobcentre Plus; Leeds Mind, Leeds City College, Learning Partnerships etc. Hard data has also been gathered from local residents through the Council's Community Hubs in Leeds to understand more about current challenges that individuals face to secure work e.g. reduction in Government funded ESOL provision.

Finally, the evaluation of existing employability programmes, Headstart and Devolved Youth Contract, included in-depth feedback from participants and providers. The findings from this research has strongly influenced the B2W delivery model and includes the need to focus on supporting people with mental health problems, ex-offenders, young people including care leavers and BAME (specifically new migrants) to gain employment. Lessons learnt which have been built into our delivery model include the need for a fluid and participant led model which will provide flexibility to decide where the key areas of focus should be (e.g. less generic employability training and more focus on socio-economic barriers). Feedback has also highlighted the need for a more local community based service rather than the rigid structure of a city centre office – again a central feature of our offer.

Action required: Not applicable.

7. Who may be affected by this activity?

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

Equality characteristics

Age

Carers

Disability

Gender reassignment

Race

**Religion
or Belief**

Sex (male or female)

Sexual orientation

Other

(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)

Please specify: Participants must be over 16 years, unemployed or economically inactive to be eligible and, have one or more additional barrier impacting on their ability to work including:

- Drug and alcohol misusers who are in recovery or have their addiction under control
- Ex-offenders
- Those declaring mild to moderate mental health issues/ learning difficulties
- Those with Autism and/or Dyslexia
- Those from Ethnic Minorities (BAME)
- Young People in particular those leaving care (16-24)
- Homeless People

Stakeholders

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify

Potential barriers.

Built environment

Location of premises and services

**Information
and communication**

Customer care

Timing

Stereotypes and assumptions

Cost

Consultation and involvement

specific barriers to the strategy, policy, services or function

Please specify

Location of Premises and Services

The evaluation criteria in Confidential Appendix A take into account the locations where potential providers are able to deliver services in order to maximise accessibility of the provision across a wide cohort of participants, the B2W Programme will have comprehensive premises coverage across Leeds. Designed as an outreach model with Key Workers (KWs) working on a flexible/mobile basis, participants will be able to access the services from a range of local delivery premises including the Council’s Community Hubs, other community venues and partner locations.

Premises will be determined based on participants having access to discreet 1-2-1 meeting space, training rooms for group work as well as for use by community and voluntary partners to deliver a truly integrated provision. All priority locations offer welcoming, trusted and informal public environments to put participants at ease. Each premise must be DDA compliant, meet with all legal requirements described in the Equality Act 2010 and, located on main transport routes. The use of sites will, where possible, be responsive to the local demographics and wider needs of local residents. For example: ESOL provision available in areas with large concentrations of BAME groups. The majority of the designated premises also offer other complementary provision such as council tax support, housing support etc.

The waiver of CPR 3.1.23 to permit post tender negotiations with providers will ensure a balanced programme of provision is achieved for the duration of the framework

Cost

Delivery cost is not an evaluation item in this procurement for delivery services and is waived under CPR 15.2. The pricing model is pre-defined in the Council’s funding bid to DWP and all potential providers on the restricted framework were made aware of the pricing model at the time of the Councils bid in compliance with the DWP bid rules.

8. Positive and negative impact

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

8a. Positive impact:

At the heart of the B2W Programme is an individually tailored package of support and structured intervention that is responsive to the needs of each participant; supported at every stage by a dedicated Keyworker (KWs). By layering this personalised assessment with behavioural insight and specialist barrier breakdown tools, dedicated KWs will be able to better understand participant needs, challenge any assumptions held by the individual

<p>or others about their circumstances and, allows the targeting of provision in a person-centre way. KWs will use a range of tools, resources and referral/signposting routes to ensure a holistic approach which breaks down barriers and ultimately moves people towards and into employment.</p>
<p>Action required:</p>
<p>Not applicable</p>

<p>8b. Negative impact:</p>
<p>Not applicable</p>
<p>Action required:</p>
<p>Not applicable</p>

<p>9. Will this activity promote strong and positive relationships between the groups/communities identified?</p>
<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>Please provide detail:</p> <p>The Back to Work Programme is targeted at marginalised and excluded groups within which requires a locally embedded approach. Our engagement with existing local providers to inform the delivery model will help to promote strong and positive relationships as a result of the fact that the local programme has been co-designed with public, private and community partners who understand the needs of the participants.</p> <p>Services will be locally embedded and co-located with existing services at community locations. This approach will promote greater alignment of local services for the benefit of local communities. Our Employer Engagement Strategy will see existing Employment Brokerage/ Enterprise support teams within the Council, Jobcentre Plus etc. working more closely with local businesses to identify new job opportunities and develop sector route-ways that can ensure participants have the best possible chance to move into sustainable work.</p>
<p>Action required:</p> <p>Not applicable</p>

10. Does this activity bring groups/communities into increased contact with each other? (e.g. in schools, neighbourhood, workplace)

Yes No

Please provide detail: See item 9 above.

Action required:

Not applicable.

11. Could this activity be perceived as benefiting one group at the expense of another? (e.g. where your activity/decision is aimed at adults could it have an impact on children and young people)

Yes No

Please provide detail:

With regard to the procurement for delivery services the evaluation criteria and waivers 3.1.23 (post tender negotiations) and 15.2 (100% evaluation on quality) do not disadvantage any particular potential provider. All potential providers have already undergone an EU tender for expression of interest during the bid submission phase and are on a restricted framework of potential providers. The purpose of this procurement is to ensure a balanced delivery profile to the priority unemployed groups across the target localities.

The DWP has identified those eligible priority unemployed groups that can be supported under the Back to Work Programme in consultation with the Leeds City Region Local Enterprise Partnership (LCRLEP). If successful, Leeds will have a particular focus on people with mild to moderate mental health (individuals in the city claiming health related out-of-work benefits remains persistent at around 31,000 and, almost half have mental health related issues). Another priority group for the Council will be care leavers (of the 472 current care leavers 18-24 years in Leeds, approximately 40% are also NEET).

However, it is unlikely that the activity / decisions taken to support participants will have a negative impact on any other groups e.g. children, not eligible for support. This is on the basis that it is recognised that the provision delivered in Leeds will be aligned with other related support and interventions e.g. as part of a wider offer of family intervention and support services available through the Families First Programme and/or as part of the Family Learning provision part of the Council's Adult Education Programme, managed by the Employment and Skills Service.

Action required:

Not applicable

12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person

13. Governance, ownership and approval

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
Sue Wynne	Chief Officer	30 March 2016

14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)

- As part of Service Planning performance monitoring
- As part of Project monitoring
- Update report will be agreed and provided to the appropriate board
Please specify which board
- Other (please specify)

15. Publishing

This Equality, Diversity, Cohesion and Integration impact assessment will act as evidence that due regard to equality and diversity has been given.

If this impact assessment relates to a **Key Delegated Decision, Executive Board, full Council** or a **Significant Operational Decision** a copy should be emailed to Corporate Governance and will be published along with the relevant report.

A copy of **all other** Equality and Diversity, Cohesion and Integration impact assessment's should be sent to equalityteam@leeds.gov.uk. For record keeping purposes it will be kept on file (but not published).

Date impact assessment completed

If relates to a Key Decision – **date sent to Corporate Governance**

Any other decision – **date sent to Equality Team (equalityteam@leeds.gov.uk)**