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

<table>
<thead>
<tr>
<th>Directorate: Children's Services</th>
<th>Service area: Employment and Skills</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead person: Craig Skinner</td>
<td>Contact number: 0113 37 87790</td>
</tr>
</tbody>
</table>

Date of the equality, diversity, cohesion and integration impact assessment: 23 August 2016 (reviewed 28 September 2016).

1. Title: European Structural and Investment Funds Programme 2014-2020: Approval of the Local Flexibility for Reducing Unemployment Programme

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<tr>
<td>Is this a:</td>
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<tr>
<td>Strategy /Policy</td>
<td>Service / Function</td>
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<tr>
<td>x Other</td>
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If other, please specify: See Item 3 below.

2. Members of the assessment team:

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
<th>Role on assessment team e.g. service user, manager of service, specialist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Michelle Anderson</td>
<td>Leeds City Council</td>
<td>Head of Projects &amp; Programmes</td>
</tr>
<tr>
<td>Craig Skinner</td>
<td>Leeds City Council</td>
<td>Projects &amp; Programmes Senior Manager</td>
</tr>
</tbody>
</table>

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

The assessment relates to the decision making process and delivery of the Leeds element of the Leeds and Bradford Local Flexibility to Reduce Unemployment Programme known as the Skills, Training and Employment Pathways (STEP) Project.

With a total value of £9.8m (up to £2.8m for Leeds) over three years, STEP offers tailored employability support for long term unemployed adults aged 25 years plus. Acting as a bridge into work, the project will support circa 1,500 individuals in Leeds to improve their skills and significantly increase their prospects of moving into sustained employment.
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)

<table>
<thead>
<tr>
<th>Description</th>
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<tbody>
<tr>
<td>The vision and themes, objectives or outcomes</td>
<td></td>
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<tr>
<td>The vision and themes, objectives or outcomes and the supporting guidance</td>
<td></td>
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<tr>
<td>A specific section within the strategy, policy or plan</td>
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</table>

Please provide detail:

4b. Service, function, event
please tick the appropriate box below

<table>
<thead>
<tr>
<th>Description</th>
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<tbody>
<tr>
<td>The whole service (including service provision and employment)</td>
<td></td>
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<tr>
<td>A specific part of the service (including service provision or employment or a specific section of the service)</td>
<td></td>
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<tr>
<td>Procuring of a service (by contract or grant)</td>
<td>X</td>
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</table>

Please provide detail:

In July 2016, the Council’s Employment and Skills Service tendered an Outline Application in a joint bid with Bradford Council to deliver the STEP Project across both districts. In September, approval was given to proceed to Full Application. This was submitted on 14 October 2016.

The STEP Project has a total value of £9.8m over three years. This includes £2.8m allocated for the benefit of Leeds residents. This is made up of £1.2m cash plus £0.3m in-kind contributions from Employment and Skills services and £1.5m match from ESIF. This provision forms a key part of the wider Leeds City Region (LCR) ESIF Programme which runs from 2014-2020 with expenditure continuing until 2023.

Bradford will lead on the delivery of the STEP Project and enter into a formal contract with the Department for Work and Pensions (DWP). The Council will work with Bradford Council under a service level agreement, as a Delivery Partner with responsibility for the implementation of the Leeds element of the provision, including procurement and contract management of all local Subcontractors.

Procurement of sub-contractors to deliver in Leeds is expected to conclude between November – December 2016 and approved by the Director of Children’s Services under a delegation. Delivery will commence as soon as possible thereafter.
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 collected, as detailed later in this document, supported by regional and local data (relied upon by the DWP as part of the development of the specification), has 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 STEP Project. All delivery partners and subcontractors will be required to 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 STEP Project, equality monitoring will also form a key element
of the robust contract management within the Council’s Employment and Skills Service, with responsibility for managing the Leeds element of the provision.

**Are there any gaps in equality and diversity information**
*Please provide detail:* Not known at this stage.

**Action required:** Not applicable at this stage.

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

<table>
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<tr>
<th>X</th>
<th>Yes</th>
<th>No</th>
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**Please provide detail:**
A range of intelligence gathered has strongly influenced the design, content, delivery model, outcomes and targets for the STEP Project.

This includes specific stakeholder events (leading up to bid submissions and hosted by both local authorities) helping to identify potential delivery partners and subcontractors and to inform this 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, younger adults (including those previously in care leavers) and older workers 50+.

Direct engagement with other statutory services in both districts has also informed this delivery model. In Leeds this includes engagement with Public Health, Adult Social Care, Childrens’ and Citizens and Communities. Additional intelligence has also been collated from partners delivering regional and local employability and skills programmes including: Jobcentre Plus, Leeds Mind, Leeds City College and Learning Partnerships. Hard data has also been gathered from local residents through the Council’s Community Hubs and Adult Learning provision to understand the current challenges and barriers that individuals face to secure work e.g. reduction in Government funded ESOL provision.

The evaluation of previous employability programmes including the LCR Headstart and Devolved Youth Contract included in-depth feedback from participants and providers. The findings have strongly influenced and been built into the STEP delivery model. This includes the need for a fluid and participant led provision offering flexibility in terms of focus and support available e.g. less generic employability training and more focus on socio-economic barriers. Feedback also highlighted the need for more locally based services rather than the rigid structure of a city centre office. These findings have been reflected in the STEP offer.

**Action required:** Not applicable.

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### 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

- **X** Age
- **X** Disability
- **X** Race
- **X** Gender reassignment
- **X** Religion or Belief
- **X** Sex (male or female)
- **X** Sexual orientation
- **X** 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:** The funding rules state that participants must be over 25 years, unemployed or economically inactive to be eligible.

### Stakeholders

- **X** Services users
- **X** Partners
- **X** Members
- **X** Suppliers
- **X** Employees
- **X** Trade Unions
- **X** Other please specify

### Potential barriers.

- **X** Location of premises and services
- **X** Stereotypes and assumptions
- **X** Consultation and involvement
- **X** Cost
- **X** Timing
- **X** Information and communication
- **X** Built environment
- **X** Customer care
- **X** Specific barriers to the strategy, policy, services or function

**Please specify**

*Location of Premises and Services*

To maximise accessibility of the provision across a wide cohort of participants, the STEP
Project has been designed as an outreach delivery model with Key Workers operating on a flexible/mobile basis across an extensive range of community venues.

Premises will largely be determined by the subcontractors but must ensure participants can have access to discreet 1-2-1 meeting space, training rooms for group work and, preferably being used by other community and voluntary partners to deliver a truly integrated provision.

All locations must offer welcoming, trusted and informal public environments to put participants at ease, be DDA compliant and located on main transport routes to maximise accessibility. The use of venues 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.

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 STEP Project is an individually tailored package of support and structured intervention that is responsive to the needs of each participant. By layering this personalised assessment with behavioural insight and specialist barrier breakdown tools, Key Workers will be able to better understand individual needs, challenge any assumptions held by the individual or others about their circumstances and all for the targeting of provision in a person-centre way. Key Workers will also use a range of tools, resources and actively promote and facilitate progression pathways for individuals to ensure a holistic approach which breaks down barriers and ultimately moves people towards and into sustainable employment.

Action required:

Not applicable

8b. Negative impact:

Not applicable

Action required:

Not applicable

9. Will this activity promote strong and positive relationships between the groups/communities identified?

Yes  
No

Please provide detail:
The STEP Project is targeted at marginalised and excluded groups. This requires a locally embedded approach to delivery. The Council's established relationship with a plethora of local providers will be relied on to support the promotion of strong and positive relationships between groups and communities. This will be further enhanced by the need for subcontractors to adopt a flexible and integrated approach to delivery in order to meet individual needs. Services will be locally embedded and co-located with existing services and at community locations where possible. This approach will promote greater alignment and integration of local services for the benefit of local residents.

**Action required:**
Not applicable

<table>
<thead>
<tr>
<th><strong>10. Does this activity bring groups/communities into increased contact with each other?</strong> (e.g. in schools, neighbourhood, workplace)</th>
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<tr>
<td>X Yes</td>
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**Please provide detail:** See item 9 above.

**Action required:**
Not applicable.

<table>
<thead>
<tr>
<th><strong>11. Could this activity be perceived as benefiting one group at the expense of another?</strong> (e.g. where your activity/decision is aimed at adults could it have an impact on children and young people)</th>
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<td>X Yes</td>
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**Please provide detail:**

The DWP has identified those eligible priority groups that can be supported under the STEP Project e.g. must be unemployed and over 25 years. If successful, Leeds will have a particular focus on people with mild to moderate mental health based on the numbers of individuals in the city claiming health related out-of-work benefits which remains high at around 32,000. In response to local intelligence and as outlined above, the project will also prioritise older adults aged 50 plus, and adults who were previously care leavers and are still facing complex or multiple barriers to employment.

However, it is unlikely that the activity / decisions taken to support participants will have a negative impact on any other groups e.g. children who are 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 and where possible, as part of a wider offer of intervention and support services e.g. alignment with the Council’s Families First Programme offering early intervention to families identified as at risk and the Personal Work Support Package – a mandatory employability service for people who are claiming Jobseekers’ Allowance and in receipt of Council Tax Support.
<table>
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<tr>
<th>Action required:</th>
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<tr>
<td>Not applicable</td>
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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)

<table>
<thead>
<tr>
<th>Action</th>
<th>Timescale</th>
<th>Measure</th>
<th>Lead person</th>
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13. Governance, ownership and approval
State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

<table>
<thead>
<tr>
<th>Name</th>
<th>Job Title</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sue Wynne</td>
<td>Chief Officer</td>
<td>26 September 2016</td>
</tr>
</tbody>
</table>

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).

<table>
<thead>
<tr>
<th>Date impact assessment completed</th>
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<tbody>
<tr>
<td>If relates to a Key Decision – date sent to Corporate Governance</td>
</tr>
<tr>
<td>Any other decision – date sent to Equality Team (<a href="mailto:equalityteam@leeds.gov.uk">equalityteam@leeds.gov.uk</a>)</td>
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