

Equality Impact Assessment / Equality Analysis

Name of Initiative, Policy or Project	Apprenticeships 2011/12 and Internships Plus 2011/12
Department	Human resources
Names of people completing assessment	Susan Baker. Paul Rodford
Date	March 2011
A front line or direct service is highly likely to have an impact on different communities. An infrastructure service may have an indirect impact. You need to use your professional knowledge to decide if you know enough about the different customer or staff groups which might be affected.	
Describe the main purpose of the Initiatives	Provide and support employment opportunities for young people (16-24) as apprentices with the council. Provision of employment opportunities and a development programme for young people (16-18) for whom the council has corporate parental responsibilities and are NEET (Not in Education, Employment or Training).
What are the main activities?	Enhancement of the current corporate Apprenticeship Scheme aimed at 16-24+ year olds and to include some for whom the council has corporate parental responsibilities. Provision of a comprehensive employment and managed support programme by way of a new 'Internship Plus' scheme targeted at 16-18 year olds who are NEET
Who is intended to benefit?	Young people 16-24 in Hampshire as apprentices Young people 16-18 in the councils care or who are leaving care and are NEET
Based on existing knowledge and information use the following checklist to decide what the impact might be on different groups with protected characteristics. Identify and summarise the data used in the grid below.	

This Equality Impact Assessment has been completed with due regard to our statutory equality needs in the performance of our functions as required by s71 Race Relations Act 1976, section 76A Sex Discrimination Act 1976 and section 49A Disability Discrimination Act 1995.

To maintain the future integrity of this report, compliance with the provisions of section 149 of the Equality Act 2010 (new public sector equality duty - PSED), in force 6th April 2011, has been considered and reflected in the 'protected characteristics' shown.

Equality Impact Assessment / Equality Analysis

The new (6th April 2011) general equality duty (PSED) will require the council, in the exercise of its functions, to have due regard to the need to:

- 1) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act (Equality Act 2010).
- 2) Advance equality of opportunity between people who share a protected characteristic and those who do not.
- 3) Foster good relations between people who share a protected characteristic and those who do not.

Consideration has also been given to what has become known as the Brown principles (on fulfilling the general duty). They are reiterated here:

- i) The decision maker who has to take decisions that do or might have an impact on equality must be made aware of his duty to have “due regard” to the aims of the general duty.
- ii) The due regard must be fulfilled **before and at the time that a particular decision is being considered**. Attempts to justify a decision as being consistent with the exercise of the duty when it was not, in fact, considered before the decision, are not enough to discharge the duty.
- iii) The duty must be exercised in substance, with rigour and with an **open mind**. The duty has to be integrated within the discharge of the public functions. It is not a question of “ticking boxes”. However the fact that the duty has not been specifically mentioned (although it is good practice to do so) is not determinative of whether it has been performed.
- iv) The duty is non delegable.
- v) The duty is a **continuing** one.
- vi) It is good practice to keep an **adequate record showing that the equality duties had been actually considered and pondered**. That disciplines decision makers to undertake their equality duties conscientiously.

Equality Impact Assessment / Equality Analysis

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<p>Age</p>	<p>National unemployment figures up to end of December 2010 show almost one million 16-24 year olds were unemployed and youth unemployment has risen to 20.5%. For care leavers 33% of 19 year old looked after children are NEET.</p> <p>The last published figures by Connexions (2009) showed Hampshire with 41,958 people aged 16-18. Of these 2,390 were NEET (5.7%). Local data excludes gap year students and youths in custody and therefore these figures are lower than those produced</p>	<p>Young people under the age of 16 will not be able to access either the apprenticeship scheme or the new 'internships plus' scheme.</p> <p>People aged over 24 will not be able to access the apprenticeship scheme.</p> <p>Young people over the age of 18 will not be able to access the internships plus scheme.</p>	<p>Young people under age 16 are in compulsory education and therefore not eligible to apply. Although some young people are excluded by age and others by not being in HCC corporate care this is not considered unlawful.</p> <p>Apprenticeship scheme entry requirements have been established as 'a proportionate means of achieving a legitimate aim' (targeted initiative to support a vulnerable group).</p> <p>Internships plus scheme is included in the same category for this purpose.</p>	<p>Despite recent falls (3rd quarter 2010-2011) in the number of 16- to 18-year-olds that are not in education, employment or training (NEET), the overall numbers remain high. Being NEET at this age is associated with negative outcomes later in life, including unemployment, reduced earnings, poor health and depression. The characteristics of young people who are NEET are diverse, although there are some groups that are at greater risk of becoming NEET. This includes, for example, those with few or</p>

Equality Impact Assessment / Equality Analysis

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	<p>by the Office for National Statistics. The number of young people in Hampshire aged 16-24 and who are NEET and Care Leaver is approximately 40</p> <p>Summary of analysis 'A'</p>			<p>no qualifications and those with a health problem, disability or low aspirations. Comment: In the modern economy, so called 'jobs for life' are increasingly rare. There is accordingly an increasing premium on the acquisition and development of generic skills, including skills in learning to learn. The opportunities offered by these proposed schemes are particularly significant to young people in care, and who are NEET.</p>

Equality Impact Assessment / Equality Analysis

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<p>Disability (NB: Include details of consultations with disabled people or representative groups)</p>	<p>There is no local data available to indicate the proportion of young people in Hampshire who are disabled, NEET and in the care of the council. National data is quite old although there is no reason to assume any significant changes in trends. A study by the University of Birmingham has shown that nationally, at age16, 68 per cent of disabled young people are in full time education, compared with 72 per cent of those who are not disabled, Most schools are well equipped to accommodate disabled</p>	<p>People will not be excluded from applying for these schemes by reason of disability.</p>	<p>People from this group would not be disadvantaged</p>	<p>Similar to above comments. The council is committed to support disabled people into employment and is a member of the 'two ticks' scheme. Disabled people may be treated more favourably under the Equality Act 2010 and under existing legacy general and specific duties.</p> <p>Reasonable adjustments will be made for any person whose disability places them at a 'substantial disadvantage'.</p> <p>Flexible working policies, including 'Hampshire</p>

Equality Impact Assessment / Equality Analysis

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	<p>pupils with reasonable adjustments.</p> <p>15 per cent of disabled young people are NEET compared with seven per cent of those who are not disabled.</p> <p>Twenty-one per cent of disabled people aged 16-24 have no qualifications, compared with nine per cent of non-disabled people of the same age.</p> <p>By age 19, the risk of being NEET for young people reporting a health problem or disability had grown to 23 per cent in 2007 (compared with 13 per cent for 17 year olds in 2005).</p>			<p>Workstyles' should increase accessibility into appropriate local workplaces.</p>

Equality Impact Assessment / Equality Analysis

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	<p>This risk of being NEET for young people reporting a health problem or disability was almost twice that of other seventeen year olds in 2005 but had then increased to almost three times that of other nineteen year olds in 2007. At age 26 years disabled people are nearly four times as likely to be unemployed as non-disabled people.</p> <p>Summary of analysis 'B'</p>			
<p>Gender reassignment (inc transsexual)</p>	<p>No local data regarding young people in this group who are in the council's care and who are NEET. Small qualitative research</p>	<p>Eligible candidates for either scheme will not be excluded on the basis of gender reassignment</p>	<p>N/A</p>	<p>The council has robust anti-bullying policies in place and is an 'employer of choice'. The council holds the 'Investors in people' award.</p>

Equality Impact Assessment / Equality Analysis

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	<p>reported by the Department for Education in February 2011 found that transgender young people are even more likely to experience bullying and harassment than young LGB people. The comments and assumptions made for sexual orientation group (see below) would therefore seem to be at least equally valid here.</p> <p>Summary of analysis 'C'</p>			<p>There is a gay / lesbian / bisexual / transgender support network in place.</p> <p>Providing a safe working environment is likely therefore to encourage applications from this protected characteristic group.</p>
<p>Marriage and civil partnership (NB: Elements 2 and 3 of the PSED do not apply to this group)</p>	<p>No available national data to indicate trends for this group in context (NEET and in council's care)</p> <p>Summary of analysis 'D'</p>	<p>Eligible candidates for either scheme will not be excluded on the basis of marriage or civil partnership</p>	<p>N/A</p>	<p>Neutral impact for this group</p>

Equality Impact Assessment / Equality Analysis

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Pregnancy and maternity	Nationally, around 15 per cent of all 16-18 year olds NEET are teenage mothers or pregnant young women. (Office of national statistics) Summary of analysis 'C' .	Eligible candidates for either scheme will not be excluded on the basis of pregnancy or maternity whether they are already or later become pregnant	N/A	Flexible working arrangements (e.g. Hampshire Workstyles) are already in place. Financial support for travelling, uniforms and other work related expenses can be provided. Continuity of placements will assist childcare arrangements.
Race	Nationally, 13 per cent of African Caribbean people aged 16-19 were NEET compared with eight per cent of white British and four per cent of those of Indian heritage. The risk of young people from Pakistani/Bangladeshi	People from this group would not be disadvantaged by reason of their colour, race, ethnicity, nationality or national origin. Includes gypsies and travellers.	N/A	The percentage of staff in this group currently employed by the council is commensurate (approximately) with the local population mix (below 10%) although this does not include gypsies or travellers. With a possible

Equality Impact Assessment / Equality Analysis

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	<p>backgrounds being NEET at 19 has decreased from 21 per cent in 2003 to 14 per cent in 2007, but they are still at greater risk from being NEET than young people from White groups (14 per cent compared with 9 per cent) and almost three times more likely to be NEET than young people from Indian backgrounds (14 per cent compared with 5 per cent). At 19, the NEET proportion among the young people recording either 'other ethnic group' or not stating ethnicity was almost twice as high as average (19 per cent</p>			<p>higher percentage of NEETS falling into this group it is likely that there will follow a higher percentage of applicants from this group. Although, no specific positive action measures have been proposed within these schemes information will be passed to the gypsy and traveller liaison unit for circulation.</p>

Equality Impact Assessment / Equality Analysis

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	<p>compared with 10 per cent in 2005).</p> <p>Young people in Hampshire who would fall into this category and that are NEET and in the council's care are too small to indicate trends.</p> <p>Summary of analysis 'C'</p>			
Religion or belief	<p>Information relating to this group in context of NEET and in care is not collated nationally. Similarly, this information is not collected locally.</p> <p>Summary of analysis 'D'</p>	<p>People from this group would not be disadvantaged by reason of their religion or belief.</p>	N/A	Neutral impact
Sex	<p>Historically, more young men than young women are NEET. For example, At end 2006, 11.4 per cent of male</p>	<p>People from this group would not be disadvantaged by reason of their sex.</p>	N/A	Traditionally most apprenticeships in the public sector and especially human resources (where it

Equality Impact Assessment / Equality Analysis

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	<p>16-18 year olds were NEET compared to 9.1 per cent of girls. (Office for national statistics)</p> <p>Information from the Department for Education, 'Statistical Release' February 2011 provides national data for NEETs that have an identifiable barrier to participation such as a child or a disability. Of 35,000 NEETS with an identifiable barrier, 28,000 are female and 7,000 are male.</p> <p>Summary of analysis 'B'</p>			<p>is anticipated some successful applicants would be placed) are occupied by women. With the higher proportion of young men being NEET (nationally 110,000 v 80,000 female) it is likely that a higher proportion of applicants would therefore be male. This should have a positive impact on equality although no specific positive action measures have been proposed.</p> <p>Flexible working arrangements (e.g. Hampshire Workstyles) are already in place to support</p>

Equality Impact Assessment / Equality Analysis

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				<p>young men and women with a barrier to participation such as a child. Financial support for travelling, uniforms and other work related expenses can be provided. Continuity of placements will assist childcare arrangements.</p>
<p>Sexual orientation</p>	<p>There is no local data regarding sexual identity and gender identity of children in care and NEET. Some assumptions can be made however. Research reported by the Department for Education indicates that compared with other young people</p>	<p>These schemes should not have a negative impact.</p>	<p>N/A</p>	<p>The council has robust anti-bullying policies in place and is an 'employer of choice'. The council holds the 'Investors in people' award.</p> <p>There is a gay / lesbian / bisexual / transgender support network in place. Providing a safe working</p>

Equality Impact Assessment / Equality Analysis

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	they experience higher levels of bullying and harassment. Pupils who have been bullied do worse than others in their GCSE exams, the difference being about 15%. At the age of 16 they are twice as likely to be NEET – 10% compared with 5% Summary of analysis 'C'			environment is likely therefore to encourage applications from this protected characteristic group.
Other consultations / engagement e.g. unions, staff groups etc.				

What conclusions have you reached about the potential impact?

Equality Impact Assessment / Equality Analysis

Conclusions reached about the impact of the programme

Possible Impact	Group/s Affected	Evidence
Positive impact on equality	Young people aged 16-24	Neet statistical release - quarterly brief – 24 th February 2011
Positive impact on equality	Sex (both males and females)	Neet statistical release - quarterly brief – 24 th February 2011

Further action (please specify)

1. The council must publish **sufficient information from this assessment (by 31st July 2011 or earlier) to demonstrate our compliance with the general equality duty** (PSED as shown on page 1) and at least annually after that, from the first date of publication. The information published must include details of the effect that these initiatives have had on people with protected characteristics, to demonstrate the extent to which they furthered the aims of the general equality duty.

Publication of this report in its entirety is likely to satisfy this requirement (names of staff involved in the completion of this report should be retained with the document but do not need to be published)

2. The council must also publish the following information:
 - **Evidence of analysis we have undertaken** to establish whether the schemes have (or will) further the aims of the general equality duty
 - **Details of the information we considered** in carrying out this analysis
 - **Details of engagement we have undertaken** with people whom we consider to have an interest in furthering the aims of the general equality duty

Publication of this report, including details (if recorded separately) of engagement with interested parties not necessarily from within protected characteristic groups (e.g. unions) is likely to satisfy these requirements.

Reviews

Equality Impact Assessment / Equality Analysis

:
Suggest no later than 5th April 2012 (Requirement to prepare and publish objectives linked to reviewed data by 6th April 2012)

Impact Assessment agreed by:

Published on web date:

Links to research:

Equality and Human Rights Commission Triennial Review: (Equality Groups and Apprenticeship)

http://www.equalityhumanrights.com/uploaded_files/triennial_review/triennial_review_internet_access.pdf

Department for Education. NEET statistics-quarterly brief (February 2011)

<http://www.education.gov.uk/rsgateway/DB/STR/d000987/osr05-2011.pdf>