

Equality Impact Assessment

The Council is required to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion of belief
- Sex
- Sexual orientation

The duty also covers marriage and civil partnership but only with regard to eliminating discrimination. And in Wales we also have to treat Welsh and English on an equal basis as well as promoting and facilitating the use of the Welsh language.

Further advice on completing impact assessments can be found on StaffNet

http://staffnet.valeofglamorgan.gov.uk/corp_cust_services/equalities/equalities_policies_guidance/equality_impact_assessments.aspx

Title and description of the policy, procedure, practice or decision (referred to as “policy” throughout form).	The reconfiguration of The Adult Community Learning Service to deliver two distinct and unique learning offers <u>(Changes in policy by Welsh Government coupled with a reduced Adult Community Learning Grant have meant that the Council needs to find a new, more cost effective way of delivering the Service).</u>
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Who is responsible for developing and implementing the policy?

Name	Phil Southard
Job Title	ACL Manager
Directorate	Learning and Skills
Division	Strategy Community Learning and Resources.

1. Who will be affected by this policy?

Examples may include Vale of Glamorgan residents, internal department(s), a specific group of customers or employees, customers or residents in a specific location.

Please specify:

Adult Community Learners (post 16)

Potential Adult Community learning (16post

Communities First, Flying Start, Families first, Library users, Job Centre Plus, Vale Volunteer Bureau, Older Persons Forum, ACL staff.

Cardiff and Vale College, Cardiff and Vale Community Learning Partnership.

2. Does the policy relate to an area where there are known inequalities (for example, disabled peoples' access to public transport; the gender pay gap; racist or homophobic bullying in schools; the educational attainment of Gypsies and Travellers)?

Yes

No

Please detail:

3. Decisions must be based on robust evidence. Please detail the evidence that you have used to inform your assessment. What evidence do you have about how your service is used? What was the strength of the evidence and did you identify any gaps? Did the evidence identify any barriers to services, or different needs and priorities for protected characteristic groups? If the evidence was weak or gaps were identified, what action have you taken to address this?

There are several sources of data used by the Adult Community Learning Service, the primary data record is the Welsh Governments Lifelong Learning Wales Record (LLWR) where a record of all ACL learners across Wales is recorded and used to set benchmarks and delivery targets for service providers. Other Data sources include:

- Cardiff and Vale College Learner database.
- Vale Unified need assessment
- Curriculum planning survey with stakeholders.
- Mori Learners Voice survey
- Careers Wales
- ESTYN Inspection report of Adult community learning

Data and statistics on participation in the Vale are monitored by a cross multi provider partnership working group the Cardiff and the Vale Community Learning Partnership (CAVCLP) the data is then analysed by its Quality and Data Sub-Group. This group recommends performance targets and monitors outcomes for the partnership Strategic Group.

Current Data shows that the CAVCLP is the lowest performing ACL partnership in Wales and is failing to meet the national performance benchmarks under the current delivery model. This Policy along with a raft of other performance improvement measures has been developed with the support of the CAVCLP in order to bring about a substantial improvement in outcomes. The decision to restructure has been taken after critical analysis of the data, combined with the needs of learners, ESTYN Post Inspection Action Plan and Inspection recommendations, and Welsh Government policy directives plus the available finance to run the service

4. There is a legal duty to consult and involve people and organisations representing the protected characteristics where it is identified that they are potentially affected by the policy (for example men; women; parents; carers; the black and minority ethnic community (including asylum seekers, refugees, economic migrants); disabled people; the Welsh speaking community;

the lesbian, gay and bisexual community; transgender people; different faith groups; etc.)

Please detail engagement activities that have taken place – internally and externally:

Adult Community Learning in Wales is supported by an annual survey of learners experiences and requirements where all Learners are given the opportunity to give their feedback on the Service in addition evaluation forms are completed by learners at the half way point and end of each learning experience and the results of these surveys are used to better plan service provision. The analysis of this feedback has been used to inform the development of this policy.

The Service has a Learners Forum where learner representatives act as a sounding board for new ideas and initiatives. The reductions in funding for ACL in Wales were widely reported and generated considerable feedback and discussion about what changes this would necessitate amongst the learners and the Learning representatives. The primary concern being the loss of the universal learning offer. No consultation has taken place on the details of this restructure as much of it is confidential however; the restructure clearly reflects the learner's and stakeholders views in seeking innovative ways to retain the universal offer and in particular the two strand approach.

In February of 2013 the Service was subject to an external inspection by ESTYN who carried out their own learner consultation exercise and involved the Learners Forum in this exercise, the feedback was used to inform the inspection report and resulting recommendations for service improvements:

Recommendations

R1 Improve success rates and accreditation for all learners

R2 Improve the provision for developing learners' literacy and numeracy skills, particularly to ensure that ABE learners have

access to higher level courses

R3 Improve the quality of teaching across the partnership

R4 Improve the strategic leadership, management and co-ordination of adult community-based learning in the Vale of Glamorgan to make sure that provision is better aligned to local and national priorities and set targets that challenge performance

R5 Analyse data robustly and improve quality processes to monitor and evaluate performance effectively to bring about improvements for learners

R6 Review and revise the curriculum to ensure that all learners have equal access to appropriate learning opportunities

The report Concluded that the Service provides poor value for money. This restructuring proposal attempts to rectify that.

The Learner focused recommendations along with the recent Welsh Governments 37.5% funding reduction has provided the driver for the restructuring of the service.

Feedback from the Older Persons Forum has raised concerns regarding the ability of some older learners on restricted income being unable to afford to continue their classes, and a range of options and alternatives have been agreed to mitigate this situation.

The Curriculum for the learning Programme supports has been put together based on the needs of the most vulnerable in our community in consultation with the Community organisations and providers who best understand those need, and aspirations. Further engagement and consultation with all those stakeholders and learners to monitor and mitigate any unforeseen impact will continue to take place.

5. Will this policy have a significant effect on how services are delivered?

Yes No

Please detail:

The current programme is a single provision that offers a wide range of learning, much of which is a subsidised programme of learning for leisure, wellbeing and pleasure. This has resulted in a situation where 70% of the learners are from the top 3 deciles (least deprived wards) and only 10% are from the bottom three deciles. (most deprived Wards) Clearly then the Service is not delivering learning to the priority learners identified by Welsh Government in the ACL Policy Document that forms the guidance for the ACL Grant: .

ACL Priority Learners

- anyone aged 16 and above accessing an ACL basic skills and/or ESOL programme, including contextualised basic skills and citizenship courses
- those who are not currently in education, training or employment and are in receipt of state benefits or support (excluding state retirement pension)
- those aged 50 plus who are not in full-time employment (and who have not previously engaged in learning or who are at risk of not engaging in learning in the future)
- they may be under-represented in the learner cohort or be non-traditional participants
- they may have low levels of formal qualifications or be returning to learning
- they may be learners associated with issue-based work such as ex-offenders, the homeless, or be adults at risk such as those with drug addiction
- they may be individuals and groups with social, physical and/or mental disadvantages and/or disabilities.

The policy will separate the learning provision into two strands one of which will deliver targeted skills based training using the Welsh Government Grant. The targeted provision is planned in partnership with relevant stakeholder organisations and representation from the priority groups to ensure that it addresses the needs of learners from those groups. Delivery will be planned to ensure that suitable progression routes and learning stepping stones will be in place to guide learners from initial

engagement. This will be achieved by learning taster sessions, leading to accredited courses and then into further education and/or employment, helping students to move out of poverty. This provision will for the most part be free to learners identified as being from the priority groups.

The wider benefits of ACL to community wellbeing are well documented. In order to maintain a universal learning offer the ACL service must build on the success of its current leisure learning offer and develop a sustainable full cost recovery delivery model. This second Learning strand will provide a Programme of leisure, wellbeing and pleasure courses on a cost recovery basis unsupported by Welsh government Grant.

6. Will this policy have a significant effect on how other organisations operate?

Yes No

Please detail:

The policy would allow the ACL service to better support the learners of partner organisations with appropriate tailored learning provision and this realignment will help those organisations achieve better outcomes for their learners, In particular we would expect to make a positive impact on the customer outcomes for:

- Communities First
- Vale Volunteer Bureau
- Families First
- Flying Start
- Job Centre Plus

- Cardiff and the Vale College

All Of these organisations will refer customers directly into ACL provision where skills assessment and diagnostic exercises will allow the service to determine individual learning plans that will greatly improve their learning successes and employment prospects

7. Will the policy impact upon other policies or practices?

Yes No

Please detail:

When this policy is embedded each of those partner organisations will be able to concentrate their valuable resources on initial engagement with their customers and use the ACL service as a next step for customers seeking to improve their skills and employment prospects. The changes to the curriculum for ACL will benefit the implementation of Vale of Glamorgan NEET Strategy, support the Improvement plan in the reduction of NEET young people and support the Older Peoples Forum by offering more opportunities to the 50 plus age group to gain skills to re-enter the job market

8. Have you identified any evidence that the policy could directly or indirectly discriminate against or have an adverse impact on people in any of the protected groups? If 'Yes', what do you intend to do to mitigate against this? If you do not intend to mitigate against any identified adverse impact please provide justification.

Yes No

Please detail:

The age profile of the current learning cohort shows us that 36% of our learners are over the age of 65 and our learner evaluation tells us that many of these learners are not seeking skills but simply learning for leisure or wellbeing, Some of these learners may not be able to afford the fees for the full cost recovery and would have to give up their activity.

In order to mitigate this issue, the service will support groups of learners who cannot or choose not to pay the enrolment fee, to form learning/social clubs so that they are able to continue their activities at a reduced cost. This support could be in providing a structured learning programme and lesson plans with short term Tutor support, provision of resources and low cost room hire etc. In addition to this the service we will signpost learners to other low cost provision offered by voluntary organisations for example University of the Third Age UA3. There will also be a variety of short recreational courses available through the skills programme that will be open to all learners that may prove attractive to this cohort. The ACL Grant is provided by the Department for Education and Skills who do not consider Wellbeing or Leisure learning as something they should fund however, the ACL sector through its all Wales strategic Group and NIACE Dysgu Cymru are lobbying both the Communities and Health Ministers to provide funding for this learning strand.

The service management team will work closely with the Older persons Officer and Older Persons Forum to try to secure additional funding for future development of new course provision..

9. What can be done further to promote equality of opportunity by altering the policy?

Please detail, including opportunities to promote good relations and community cohesion:

In other parts of Wales the Personal development and confidence building courses have proved valuable in supporting groups and individuals from the lesbian, gay, and bisexual: transgender community and we hope to develop links to local groups in the Vale of Glamorgan.

Initial talks with Vale Volunteer Bureau regarding the development of a time-banking credit scheme for adult learning courses are promising and a pilot model will be tested in the Autumn term.

10. Has the assessment identified the need for future monitoring? If so, what monitoring do you intend to conduct? (for example the number of disabled people using your service as a proportion of the general population)

Please detail:

The profile of the learning cohort will be under close scrutiny by the Service itself, the CAVCLP Quality and Data Subgroup and the Welsh Government LLWR all of whom will be monitoring any changes in learner profile.

The ESTYN Inspection Team will be returning in October and the Service must be able to demonstrate to the Inspectors that they have implemented the report recommendations and improved the provision for the Priority Group Learners. Welsh Government will also be monitoring the use of the grant funding and ensuring that the spend is on the priority groups previously identified in the EIA.

11. How often will you analyse and report upon this data, and where will it be reported?

Please detail:

The Data will be reviewed termly and a report will be presented at The CAVCLP Strategic Group. The data is also a key benchmark in the Service delivery plan where it will be reported biannually. A full breakdown of learners and success rates is produced and published by Welsh Government via the Lifelong Learning Wales Record every year. The Local Authority will also monitor progress of the service and its learners through its performance management systems and regular performance reviews with elected members

12. How will you publish and publicise the policy to ensure equality of access to this information (including raising awareness with minority groups, producing information in accessible formats, etc.)?

Please detail:

The new service provision will be published through the production of the Adult Learning brochure and distributed widely via the network of partner organisations and stakeholders that helped to develop the programme. It will be

available in all formats and on the Vale of Glamorgan website; it will also be available to learners, tutors and the general public through newsletters, social media and press releases.

13. Any recommendations for action that you plan to take as a result of this impact assessment (listed in the sections above) should be included in your Team Plan or Departmental Service Plan.

Please detail those actions and where they will be placed:

The profile of the current learning cohort shows us that 36% of our learners are over the age of 65.

Learner feedback and evaluation show that many adult learners are not seeking skills but simply learning for leisure or wellbeing, Some of these learners may not be able to afford the fees for the full cost recovery and would have to give up their activity.

In order to mitigate this service will support groups of learners who cannot or choose not to pay the enrolment fee, to form learning/social clubs so that they are able to continue their activities at a low cost. This support could be in providing a structured learning programme and lesson plans with once a term Tutor support, provision of resources and low cost room hire etc. In addition to this the service will signpost learners to other low cost provision by voluntary organisations such as University of the Third Age (UA3). There will also be a variety of short recreational courses available through the skills programme that will be open to all learners that may prove attractive to this cohort. The ACL Grant is provided by the Department for Education and Skills who do not consider Wellbeing or Leisure learning as a priority area for grant funding. However, the ACL sector through its all Wales strategic Group and NIACE Dysgu Cymru are lobbying both the Communities and Health Ministers to provide funding for this learning strand.

The service management team will work closely with the Older persons Officer and Older Persons Forum to try to secure additional funding for future development of new course provision

Service Team Plan Action; To mitigate the impact of the new ACL delivery model o learners and in particular older learners, by initiating a range of alternative social/ learning clubs with appropriate support, the involvement of other Third sector learning providers as alternative provision, and by exploring opportunities to secure other funding sources that will cater for any unmet needs.

14. An equality impact assessment may have four possible outcomes, though more than one may apply to a single policy. Please indicate the relevant outcome(s) of the impact assessment below.

Please tick as appropriate:

No major change – the impact assessment demonstrated that the policy was robust; there was no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

Adjust the policy – the impact assessment identified potential problems or missed opportunities. The policy was adjusted to remove barriers or better promote equality.

Continue the policy – the impact assessment identified the potential for adverse impact or missed opportunities to promote equality. The justification(s) for continuing with it have been clearly set out. (The justification must be included in the impact assessment and must be in line with the duty to have due regard. Compelling reasons will be needed for the most important relevant policies.)

Stop and remove the policy – the impact assessment identified actual or

potential unlawful discrimination. The policy was stopped and removed, or changed.

15. Authorisation

This equality impact assessment must be authorised by the relevant Head of Service or Operational Manager.

Approved by (name)	
Job Title	
Date	

Signature _____

On completion of this form send a signed copy and an electronic copy to the Equalities Section: tsgreaves@valeofglamorgan.gov.uk. For support, ring: 01446 709446