

Equality Impact Assessment Form

The Equality Act 2010 includes a public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011. The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services, and that they are kept under review. This will achieve better outcomes for all.

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 guidance refers to these three elements as the three 'aims' of the general duty and so when we discuss the general duty we mean all three aims.

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 Act describes fostering good relations as tackling prejudice and promoting understanding between people who share a protected characteristic and those who do not. Meeting the duty may involve treating some people more favourably than others, as long as this does not contravene other provisions within the Act.

The following principles are drawn from case law on the previous equality duties, and will continue to be relevant in relation to the new duty. To meet the general duty, a public authority must ensure:

- **Knowledge:** those who exercise its functions (its staff and leadership) are aware of the duty's requirements. Meeting the duty involves 'a conscious approach and state of mind'. Decision-makers should therefore be aware of the implications of the duty when making decisions about their policies and practices.
- **Timeliness:** the duty arises before and at the time that a particular policy is under consideration and a decision is taken. A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- **Meaningful consideration:** consideration of the three aims of the general duty must form an integral part of the decision-making process. This is not a 'tick box' exercise – it must be exercised with rigour, with an open mind in such a way that influences the final decision.
- **Sufficient information:** the decision-maker must consider what information s/he has as well as what further information might be needed to give proper consideration to the general duty.
- **Review:** public bodies must have due regard to the aims of the general duty not only when a policy is developed and decided upon, but also when it is implemented and reviewed. The general duty is a continuing duty.
- **Non-delegation:** Anyone exercising public functions on behalf of a public body is required to meet the duty. This is because the duty rests with the public authority even if they have delegated any functions to another organisation.

The Equality and Human Rights Commission has produced guidance for the performance of the general duty in Wales, known as the specific duties in Wales. The specific duties include guidance on impact assessment and engagement that are both relevant to this process. Copies of the guidance are available on the Commission's website and via the equality section of StaffNet.

An impact assessment is a systematic way of finding out the impact of a policy on different protected groups. Officers who are responsible for policies are required to identify the likely impacts that may result from the introduction of a policy.

This impact assessment form has been developed to ensure that these groups are neither directly nor indirectly discriminated against in the planning and delivery of our services, nor by the decisions that we make.

An equality impact assessment must be carried out at a formative stage so that it is an integral part of the development of the policy, not a later justification of a measure that has already been determined.

How should you assess impact?

1. Identify **the objectives** of your policy and how it will work.
2. Examine local and national **data and research**.
3. Assess **the likely impact** on the protected groups.
4. **Consult and involve** people who are likely to be affected by your policy.
5. Make arrangements to **monitor and review** the impact of your proposal.
6. **Publish** the assessment.

It is the responsibility of the relevant Head of Service or Operational Manager to ensure that an assessment has been completed for the policy, practice, procedure or decision identified.

Complete form electronically and return to the Equalities Section: tsgreaves@valeofglamorgan.gov.uk. For support, ring: 01446 709446

Title and Description of Policy, Procedure, Practice or Decision (referred to as “policy” throughout form).	Vale of Glamorgan Council NEET Strategy. The aim of the strategy is to reduce the number of young people aged 14-19 who are not in employment education or training (NEET) in the county.
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Who is responsible for developing and implementing the policy?

Name	Andrew Borsden
Job Title	Principal Youth Officer
Directorate	Learning and Skills
Division	Strategic Planning and Performance, Youth Service

1. Background and screening:

Who will be affected by this policy?

Vale of Glamorgan residents

Please ✓

Internal department(s) (please state which):

Customers/residents in a specific geographical location

Specify location:

Specific group of customers

Specify group (for example, a particular age group or gender, gypsy / traveller children in education, people with dementia):

Young people 14-19 who are at risk of or who are identified as NEET

Others

Please specify:

What research or baseline information do you have about how your service is used by various groups of people?

The Welsh Government

The nature of the NEET client group is such that it is very difficult to obtain accurate statistics since, from the age of 16 these young people have followed numerous different paths and disengaged to varying degrees from society. Research shows that young people who are NEET are more likely to experience multiple problems or barriers to engagement.

- To have a history of not attending school.
- To have a Looked After Child (LAC) status.
- To have a history of fixed term exclusions.
- To have education other status.
- To have special educational needs statements.
- To have experienced more frequent episodes of unemployment and for longer periods if they are long term NEET.
- To have lower qualification attainment levels.

· To have been in contact with the Youth Offending Team.

Those who are NEET are therefore also more likely than the general population to experience multiple problems.

It is therefore impossible to identify NEET in a homogeneous group.

Cordis Bright; Research into Post 16s who are not in education, employment or training (NEET) in Cardiff and the Vale of Glamorgan
July 2007

Welsh Government; Reducing the proportion of young people not in education and training in Wales April 2009

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

Yes ✓ No

Please detail:

The strategy will enable resources to be directed to the young people identified as NEET who are the most in need of support. Those whose need is compounded by individual challenges may not be able to access some provisions, but all efforts will be directed to assist when appropriate.

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

Yes ✓ No

Please detail:

To implement the strategy there will be a need for services and organisation to work more closely and collaboratively. This will include development of WASPI protocols and memorandums of understanding between the council and some of its partners.

Does the policy involve a significant commitment of resources?

Yes ✓✓ No

Please detail:

The development of the NEET strategy is incorporated into the Council Improvement plan, working in partnership with other departments and Welsh Government funding agencies financial resource will be directed to this initiative in accordance with the council's budget

setting processes.

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, educational attainment of Gypsies and Travellers)?

Yes No

Please detail: The strategy makes reference to young people leaving care and the responsibility the council has to young people with additional learning needs or disabilities.

What are the intended outcomes of the policy (outcomes to be specific, measurable, achievable, results oriented, time-based)?

Please detail:

Reducing the number of young people aged 14-19 who are not in employment, education or training (NEET)

How will these be measured?

Please detail:

The strategy will ensure that progress is monitored and measured by the following outcomes

1. Reduction in the percentage of young people whose NEET status is unknown
2. Reduction in the percentage of young people who leave full time education aged 18 and become NEET
3. Young people at risk of becoming NEET are identified and provided with targeted support through transition periods, such as progression to post 16

Will the policy impact upon other policies or practices?

Yes No

Please detail:

Vale of Glamorgan Youth Support Services Strategy
Vale of Glamorgan Youth Services Team plan
Learning and Skills Plan
Improvement Plan
Community Strategy

What data or research is available on the policy (for example, statistics, survey results, best practice advice)?

Please detail:

There are several sources of data on young people who are NEET. Local data is obtained by detailed analysis of the National picture in Wales. This is provided by Carers Wales monthly and six monthly and annually. It is shared with the NEET Strategic group meetings which monitor the performance of the strategy. The meeting receives information via Learning Coaches report cards, Careers Wales monthly feedback and from Cardiff and the Vale College information sharing. Therefore data is contained in:

NEETS Strategic Group Minutes of meetings

NEET Operational Group minutes

The national sources of data are:

Careers Wales Destination Survey

www.Data.Gove.Uk statistics on young people not in education, employment or training (NEET) in Wales

Are there any gaps in data which necessitate further research or consultation?

Yes No

Please detail:

It is important to gather the views of service users on the impact the interventions of the strategy has made on their lives and progress into to learning or work. It is recognised that young people in the Vale of Glamorgan have a role to play in the shaping of services it is therefore essential they are engaged in the development and design of services. The Vale of Glamorgan Youth Service and its partners in the NEET strategy will be encouraging young people to fully participate in the design of services through its Participation Officer post

16 Learning Coach and Careers Wales.

Is there any evidence that there are different levels of service uptake for different protected groups, for example, do men use the policy more than women?

Yes

No

Please detail:

The Cordis Bright Research highlighted that NEET are more likely to be male, however the strategy is not exclusively directed at any one gender or homogeneous group.

Is there any evidence that there are barriers that might exclude any of the protected groups from accessing the policy?

Yes No

Please detail:

The Cordis Bright research suggests that some young people who are leaving care and those who have ALN or disability are more likely to be NEET. The barriers these young people face are significantly challenging in terms of appropriate provision, access to training providers and suitably trained persons available to cater for their individual needs. The strategy will through its Operational Group seek to find ways in which these young people can access Education Employment or Training (EET). As the lead agency the Council will:

1. The Council has no direct responsibility for learners post 18 years, however the Local Authority does have legal responsibilities under various legislation including the following: The Children Act 1989 and Leaving Care Act 2000 in respect of relevant children, The Children and Young Persons Act 2008 has inserted provision into the Children Act 1989 permitting certain young people who were formerly looked after by Local Authority to reconnect to care for the purpose of pursuing education or training and Local Authority responsibilities pursuant to those duties to provide support remains available for young people up to the age of 25 or beyond if their education or training programme continues beyond that age.
2. There is a clear expectation that Adult Social Services Departments will engage effectively in transition planning for disabled young people. The Chronically Sick and Disabled Persons Act sets out that in relation to disabled people there is a responsibility on Local Authority to make provision for lectures, games, outings or other recreational facilities outside a persons home or assistance to that person in taking advantage of educational facilities available to him. This includes the provision of specific educational facilities that the assessment of needs identifies as being necessary and support to enable the disabled person to access education in relation to disabled persons

Is there evidence that any of the protected groups will have different needs or priorities with regard to the proposed policy?

Yes No

Please detail:

The strategy will ensure learners needs are treated fairly and as a priority and that all young people have the opportunity to engage with

EET opportunities. Specifically by providing when appropriate

- Learner Emotional Support
- Disability Access
- Literacy and Numeracy support
- Adult Service support

Is there any evidence that the policy could discriminate, directly or indirectly, against people in any of the protected groups?

Yes No

Please detail:

There is no evidence that the plan could discriminate and it has been developed with due regard to the councils responsibilities and Strategic Equalities Plan

Can anything be done further to promote equality of opportunity by altering the policy?

Yes No

Please detail:

Should there be an emergence of an issue of inequality the strategy could be amended in the future to cover distinct need or equality matters.

2. Relevance

Is an equality impact assessment relevant to this policy?

Yes ✓ **No**

Where, as a result of the above screening, the officer responsible for the policy believes that an equality impact assessment is not relevant, they should initially discuss this with the Council's equalities coordinator, and record and explain the decision.

Please detail:

Yes

3. Gender

Will the policy have a negative impact, directly or indirectly, on women or men?

Please detail evidence:

There is no evidence to suggest that this strategy will have a negative impact on anyone conversely the strategy will have a positive aspect on many lives.

Will the policy have a positive impact, directly or indirectly, on women or men?

Please detail evidence:

In the Vale approximately 60% of young people who are NEET are male therefore it is reasonable to assume the majority of provision will be taken by males. However all young people who are identified as NEET will have an equal opportunity to engage in EET.

Will the policy have no gender-specific impact?

Please detail evidence:

There is no evidence to suggest that this strategy will benefit one gender more than the other

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on men or women?

Please detail evidence:

Services developed under the strategy will be targeted at both male and female, provision will be developed with progression for the student in mind. Young people will be encouraged to take up EET and to aspire for better things and improve their community and

prospects as a result.

4. Race

Will the policy have a negative impact, directly or indirectly, on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

There is no evidence which suggests that a strategy of this nature will have a negative impact. In fact the strategy is aimed to improve the prospects for young people their families and communities

Will the policy have a positive impact, directly or indirectly, on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

Yes the NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever race, gender religion, sexual identity, disability background or personal circumstances'

Will the policy have no impact, directly or indirectly, on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

The strategy will enable engagement from all cultures and be accessible to all.

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

The NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever race, gender religion, sexual identity, disability background or personal circumstances'. All provisions will be monitored and young people's evaluations of their learning analyzed to ensure negative impacts are minimised or eradicated all together.

5. Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Will the policy have a negative impact, directly or indirectly, on disabled people?

Please detail evidence:

There is no evidence which suggests that a strategy of this nature will have a negative impact. In fact the strategy is aimed to improve the prospects for young people their families and communities

Will the policy have a positive impact, directly or indirectly, on disabled people?

Please detail evidence:

Yes the strategy will ensure provision is available to all young people, ensuring it is fit for purpose and is accessible and appropriate to their support and learning needs.

Will the policy have no impact, directly or indirectly, on disabled people?

Please detail evidence:

The strategy will encourage and develop opportunities for all young people regardless of ability.

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on disabled people?

Please detail evidence:

The NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever race, gender

religion, sexual identity, disability background or personal circumstances'. All provisions will be monitored and young people's evaluations of their learning analyzed to ensure negative impacts are minimised or eradicated all together.

6. Welsh language

Will the policy have a negative impact, directly or indirectly, on the Welsh language?

Please detail evidence:

No, young people will have access to the Welsh Language on request and when appropriate

Will the policy have a positive impact, directly or indirectly, on the Welsh language?

Please detail evidence:

Welsh speakers if identified as NEET will have the same opportunities as all other young people.

Will the policy have no impact, directly or indirectly, on the Welsh language?

Please detail evidence:

The strategy will have no impact on Welsh speakers or on the Welsh Language

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on the Welsh language?

Please detail evidence:

The NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever language needs they have or their personal circumstances'. All provisions will be monitored and young people's evaluations of their learning analyzed to ensure negative impacts are minimised or eradicated all together. The strategic group will canvass young people's views to ensure all provision meets the needs of all young people

7. Age

Will the policy have a negative impact, directly or indirectly, on different age groups (e.g. people over 50, people under 16)?

Please detail evidence:

The strategy is targeted at the young people in the age group 14-19 but the impact on these young people will have lasting effects on their families and on the community at large by reducing disaffection and worklessness.

Will the policy have a positive impact, directly or indirectly, on different age groups?

Please detail evidence:

Yes. If the policy is successful in engaging young people and moves them into employment, the burden on families and the reduction on the impact of unemployment can be felt by older family members.

Will the policy have no impact, directly or indirectly, on different age groups?

Please detail evidence:

The strategy will have an impact on young people their families and the wider community

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on people of different age groups?

Please detail evidence:

The needs of different age groups are covered by the Integrated Community Plan, Older peoples Forum, Learning and Skills Partnership and Adult Community Learning curriculum

8. Religion, belief or non-belief

Will the policy have a negative impact, directly or indirectly, on people with different religions, beliefs or non-beliefs?
Please detail evidence:

There is no evidence to suggest that this strategy will benefit one religion more than the other

Will the policy have a positive impact, directly or indirectly, on people with different religions, beliefs or non-beliefs?
Please detail evidence:

There is no evidence to suggest that this strategy will benefit one belief or non belief more than the other

Will the policy have no impact, directly or indirectly, on people with different religions, beliefs or non-beliefs?
Please detail evidence:

There is no evidence to suggest that this strategy will benefit one religion more than the other

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for people with different religions, beliefs or non-beliefs?
Please detail evidence:
The NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever race, gender

religion, sexual identity, disability background or personal circumstances'. All provisions will be monitored and young people's evaluations of their learning analyzed to ensure negative impacts are minimised or eradicated all together.

9. Sexual orientation

Will the policy have a negative impact, directly or indirectly, on lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

There is no evidence to suggest that this strategy will unequal to lesbians, gays, bisexuals or heterosexual people

Will the policy have a positive impact, directly or indirectly, on lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

This strategy is open to all persons and everyone will be treated equally and fairly regardless of their sexual orientation

Will the policy have no impact, directly or indirectly, on lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

The NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever race, gender religion, sexual identity, disability background or personal circumstances’.

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

All provisions will be monitored and young people’s evaluations of their learning analyzed to ensure negative impacts are minimised or eradicated all together.

10. Gender Reassignment

Will the policy have a negative impact, directly or indirectly, on transgender people?

Please detail evidence:

There is no evidence to suggest this strategy will have a negative impact on a transgender person. This strategy is open to all persons and everyone will be treated equally and fairly regardless of their sexual

Will the policy have a positive impact, directly or indirectly, on transgender people?

Please detail evidence:

This strategy is open to all persons and everyone will be treated equally and fairly regardless of their sexual

Will the policy have no impact, directly or indirectly, on transgender people?

Please detail evidence:

The NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever race, gender religion, sexual identity, disability background or personal circumstances’.

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for transgender

people?

All provisions will be monitored and young people's evaluations of their learning analyzed to ensure negative impacts are minimised or eradicated all together. This strategy is open to all persons and everyone will be treated equally and fairly regardless of their sexual

Please detail evidence:

11. Pregnancy and maternity

Will the policy have a negative impact, directly or indirectly, on women during pregnancy or maternity?

Please detail evidence:

This strategy is open to all persons and everyone will be treated equally and fairly regardless of maternity or paternity issues

Will the policy have a positive impact, directly or indirectly, on women during pregnancy or maternity?

Please detail evidence:

This strategy is open to all persons and everyone will be treated equally and fairly regardless of their maternity and child care situation

Will the policy have no impact, directly or indirectly, on women during pregnancy or maternity?

Please detail evidence:

The NEET Strategy will encourage that all providers promote opportunities and access for all young people whatever race, gender religion, sexual identity, disability background or personal circumstances'.

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for women during pregnancy or maternity?

Please detail evidence:

All provisions will be monitored and young people's evaluations of their learning analyzed to ensure negative impacts are minimised or eradicated all together.

12. Consultation and involvement

What consultation and involvement activities have taken place? (for example focus groups, public surveys, public meeting, etc.)

Please detail: The strategy has been drafted and prepared after a wide consultation with many organisations and young people who are members of the Vale Youth Service. Organisations were asked for direct input into the strategy and the action plan and the document took up to six months to prepare. Organisations involved

Careers Wales

CYPP

People Business Wales

Communities First

Cardiff and Vale College

ALN learning and Skills

Vibe Experience

VCVS

Vale Volunteer Bureau

Llanmau

Learning and Skills Partnership

JCP

What arrangements have been made to consult and involve people and organisations representing the protected characteristics, which have been identified as potentially being 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:

The NEET Strategy Group canvassed its members and those organisations in the Vale of Glamorgan working with young people via the CYPP TO encourage stakeholders engaged with their users and gauge response to the strategy. No responses were received from young people but organisations contributed greatly to the final document. It is planned to consult and engage with young people throughout the life of the document to further develop services..

How have the results of the consultation been implemented?

Please detail:

The document has been amended several times and organisations involved have responsibilities in the associated action plan.

13. Monitoring

What monitoring data do you intend to collect? (for example the number of disabled people using your service)

Please detail:

The strategy will be reliant on data collected Education, Youth Services and Careers Wales. Success will be measured by the results of the Carers Wales Destination Survey will publishes data every six months. In addition the NEET Strategic Group will monitor on a monthly basis the engagement of young people in various provision in and out of schools

How often will you analyse and report this data?

Please detail:

Monthly, six monthly and annually

Where will you publish the report on this data?

Please detail:

Careers Wales will produce an annual report on the level of, EET destinations of young people who are or at risk of becoming NEET

14. Publication of policy

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 strategy will be available on the councils website

15. Further action

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:

No ✓

16. Outcome

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

17. Authorisation

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

Approved by (name)	Paula Ham
Job Title	Head of Strategic Planning and Performance
Date	16 th August 2013

18. Completed Impact Assessments:

A copy of this form must be sent to the Equalities Coordinator for publication on the Council's website.