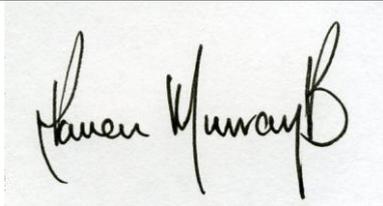


# EII: ethnic intersectionality initiative

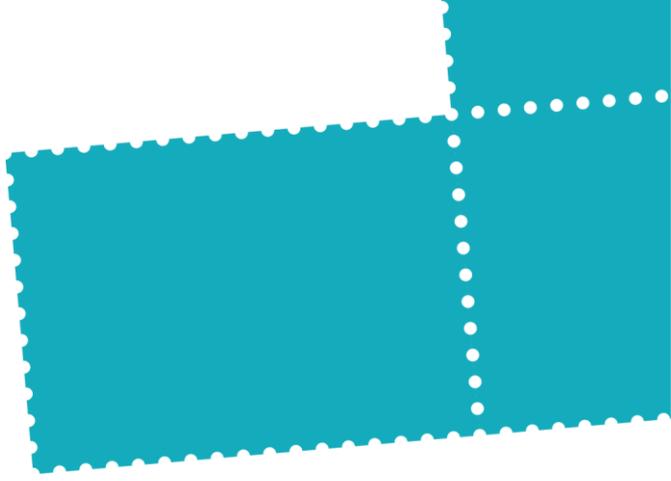
## Equality Impact Assessment

### 1. Introduction

<b>Name of Policy</b> - Within equality legislation, the term 'policy' refers to products, services, strategies, policies, key decisions, etc.		
EII: ethnic intersectionality initiative pilot. <b><i>This is an action from the MA EAP.</i></b>		
<b>Responsible Manager:</b>		
Karen Murray		
<b>Is the policy contracted out to another organisation?</b> (*delete as applicable)	<b>*No</b>	<b>*Yes</b>
<b>If yes, which organisation is the policy contracted to?</b>		
<b>Is responsibility for delivery shared with others?</b>	<b>*No</b>	<b>*Yes</b>
<b>If yes, who are your partners?</b>		
SDS contracted Providers		

<b>Approved by:</b>		<b>Date Approved:</b>	<u>13.8.18</u>
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<b>Review Date:</b>	28 <sup>th</sup> February 2019
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Equality Impact Assessments will be published on Skills Development Scotland's website. If you have any queries regarding this Equality Impact Assessment please contact [equality@sds.co.uk](mailto:equality@sds.co.uk).

## 2. Summary of Policy

### Objectives

This action is part of the SDS Equality Action Plan for apprenticeships. The purpose of the intervention is to trial an approach to supporting our normal contracting model which encourages participation of people from a Black and minority ethnic (BME) background who may also experience additional barriers to their participation in Modern Apprenticeships

The objectives of the project are:

To pay a small recruitment incentive of £500 to Providers to support entry to the MA programme for individuals from BME communities who have further barriers to entry to the MA programme to encourage providers to appropriately support recruitment and sustainment of these people on their MA. To coordinate support to associated employers of potential candidates from the above group to apply for the [SERI](#) payment

Providers will be able to apply for the £500 incentive for **new starts in the MA** programme who **are aged 16+** from **the target group** and have **additional barriers** causing **cumulative disadvantage**.

It is hoped that the employer may also be able to be incentivised through the SERI thereby incentivising the key parts of the pathway making the MA accessible to those currently under represented but keen to participate. Details of SERI can be found here:

<https://www.ourskillsforce.co.uk/help-with-recruitment/our-one-stop-skills-shop/scotlands-employer-recruitment-incentive/>

## 3. Evidence and Consultation

The disadvantage and under-representation of BME people and other groups is set out within SDS Equality Action Plan for Modern Apprenticeships. There are specific targets which the plan seeks to address:

- **Disability**-increase the employment rate for young disabled people to the population average by 2021 (8%-12%); and sustaining in the MA in line with overall programme achievement rates.
- **Black, Minority Ethnic communities**- increase the number of MA starts from BME communities to equal the population share by 2021 (c4% for Scotland, but in line with each local LA figure)
- **Segregation male to female ratio**: to reduce to 60% MA frameworks where the gender balance is 75:25 or worse by 2021
- **Care Experienced**, increase the number successfully taking up MAs and improving achievement and sustaining in line with the overall programme achievement rates.

The annual update for the equality action plan sets out our progress towards these targets and identifies the challenges and barriers that these groups have.

**The 2017/18 figures** show we have achieved c11% of young people declaring themselves disabled and we continue to see a rise in participation from care experienced young people. Whilst we have seen a rise in starts for individuals declaring themselves as **BME from 1.6% to 1.7%** we recognize that there is a clear need for more specific action to be taken in this area. The **2017/18** statistical analysis also shows that the achievement rate for the MA across the whole annual cohort of leavers is 78% but is only 73% for BME people, suggesting that more work is required to support people from these groups to sustain their apprenticeship.

Evidence within the literature shows that in Scotland black women, ethnic minority women and disabled women are among the most disadvantaged with Muslim women experiencing particular disadvantage. Similar cumulative disadvantage is often experienced by gay or lesbian members of ethnic minorities. (*EU report, "Intersectional discrimination in EU gender equality and non-discrimination law" (Sandra Fredman, May 2016)*

(<http://www.equineteurope.org/Intersectional-discrimination-in-EU-gender-equality-and-non-discrimination-law> and the *SPICe Briefing*)

SDS has engaged and worked with partner organisations including Rathbone, Radiant and Brighter, BEMIS, WESREC and others to: raise awareness of apprenticeships in BME communities; encourage applications and support to start. It has become apparent that increasing the number of starts from individuals from the BME communities of Scotland is a very challenging target and in part that is because of the interplay of factors in addition to the well documented discrimination experienced by those from BME communities seeking to enter the labour market.

(*See the Race Equality Framework for Scotland 2016-2030, crown copyright 2016; Poverty and Ethnicity: Key messages for Scotland, Joseph Rowntree Trust, January 2016; SPICe Briefing, Ethnicity and Employment, Suzi MacPherson, June 2015*)

Stakeholders and community groups including Amina, Sikh Sanjog (Edinburgh), Radiant and Brighter and others highlight that young people from these communities are more likely to present when older, especially women. Internal analysis from our incomplete data set, supported by qualitative review of our ongoing actions shows that, for a number of BME people, there are challenges in terms of being recruited by an employer into an apprenticeship when they apply.

One factor Providers and community groups including those representing new Scots highlight as a barrier for some people from BME communities is the age profile for apprenticeship starts as these individuals sometimes experience longer and more diverse learner journeys. This incentive will allow us to support training providers to recruit more diversely, spend more effort in supporting them to sustain, whilst not being financially disadvantaged.

#### 4. Impact on different equality groups

Protected Characteristic	Relevant? (Y/N)
Age	Y
Disability	(No use the enhanced funding initiative)
Gender	Y
Gender Reassignment	No data
Race	Y
Religion/Belief	Y
Sexual Orientation	Y
Care Experienced	(No use the enhanced funding initiative)
Other groups who may face disadvantage, e.g. people with an offending history, socio-economic disadvantage etc.	Y

**Please give further information:**

This pilot initiative is intended to focus support on those from BME communities and focus on cumulative disadvantage as these groups remain under represented and evidence shows incentivising is potentially a key tool but evaluation will enable us to take forward the learning.

This incentive does not disadvantage those with other protected characteristics as an additional barrier is a pre requisite to apply.

The amount, £500 is unlikely to be an amount which would lead to displacement of others but simply an attempt, after consultation with Providers and Skills Investment Asdvisers (SIAs), to level the playing field a little.

Those who are disabled or care experienced whether they are BME or not will be directed to use the Enhanced funding for 16-29 year olds to support their entry to the MA as the Provider will receive a greater enhancement in most cases although if 30+ potentially they could apply to EII.

## 5. Monitoring and Review

<p>This pilot project will be monitored closely to identify:</p> <ol style="list-style-type: none"> <li>1. Whether the incentive is improving participation of BME groups</li> <li>2. Whether the incentive is being appropriately used to support sustainment within the apprenticeship</li> <li>3. What approaches providers are using to improve participation</li> <li>4. What approaches providers are using to support sustainment</li> <li>5. What are the challenges that beneficiaries of the incentive are having (apprentices, employers, providers)</li> <li>6. Whether the incentive is having any unexpected negative impact on any other under-represented groups as defined by the equality act and/or DYW.</li> </ol>
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## 6. Action Plan

Action	Action Owner	Due Date	Public Sector Duty (1, 2 or 3)
Ensure the design and criteria are not detrimental to those with protected characteristics who are not in the target group.	NTP Equality team	30/4/18	2 and 3
Develop criteria to address the cumulative disadvantage for BME young people with additional barriers	NTP Equality team	30/4/18	1
Monitor applications	NTP Equality team		1
Evaluate the EII	NTP Equality team & Evaluation and research team	28/2/19	1 and 2
Discuss findings with NTP Equality team	Team leader of NTP Regional Equality team	March 2019	1,2 and 3

Public Sector Equality Duties: 1. Eliminate discrimination and harassment ;2. Advance equality of opportunity; 3. Foster good relations