

Equality & Human Rights Impact Assessment

revised 2017

The purpose of this template is to ensure that policy makers consider impacts on equality and Human Rights when developing new or revising existing policies, practices or operating guidelines. The EqHRIA document should be used in conjunction with the Guidance Notes.

Title of the Policy:	Modern Apprenticeships
Impact Assessed by:	Charlene Archibald
Signature(s) of assessor(s):	Charlene Archibald
Date of Impact Assessment:	31/05/2017

Step 1: (a) Identify the aims of the policy

<ul style="list-style-type: none"> (i) What is the purpose of the policy? Why has this policy been developed? (ii) How does the policy seek to achieve its purpose? (iii) How do the aims of the policy relate to equality and human rights?
<p>The Commission for Developing Scotland's Young Workforce report and the Scottish Governments' Developing Young Workforce youth employment strategy made some recommendations to disability, Black and Minority Ethnic, gender and care leavers, some of the recommendations included ambitions specifically for Skills Development Scotland (SDS) Modern Apprenticeships. MAs are an important component of the Scottish Governments measures to promote sustained employment and contribute to developing Scotlands' workforce and SDS administer public funding contribution through contracts with Forth Valley College and other providers. SDS Equalities Action Plan outlines the challenges to be addressed and key action themes. (See appendix for SDS key themes).</p> <p>The aim of the policy is to identify decisions that have an impact on protected characteristic groups within Modern Apprentice provision. The policy could advance equality if it was proactive in attracting under represented groups.</p> <p>Reflecting on impacts will also allow for consideration of alternative options, and to highlight positive impacts too.</p> <p>The policy seeks to achieve improved processes relating to the recruitment activities on to Modern Apprenticeship programmes within Forth Valley College. This policy relates to equality because we are aware that certain groups are under-represented and that we need to ensure that we have considered any barriers that protected characteristic groups might face in the recruitment, selection and on programme processes.</p>

Step 1: (b) Identify who is affected by the policy

- (i) Who benefits from this policy?
- (ii) How does the group of people benefit from the policy?
- (iii) Who does not benefit from the policy? Is anyone disadvantaged?
- (iv) If so, how is the group of people disadvantaged by this policy?

Forth Valley College do not have the evidence to suggest that MAs will not benefit from this policy, nor will the be disadvantaged. Forth Valley College Modern Apprentices and learners wishing to advance their studies through our provision will benefit from this policy. FVC learners and staff will know that the college is committed to ensuring equality is embedded across all practice. All learners at FVC including those with protected characteristics will have access to a range of MA routes that reflects individual and local needs. All learners will benefit from a vocational curriculum that reflects a wide range of requirements in an environment, free from discrimination and harassment. FVC learners with protected characteristics will be provided with the opportunity and support to progress equally onto positive destinations. FVC staff will understand the requirement to promote equality in the fulfilment of their job role. The strategy does not have any specific actions that would eliminate discrimination, however by taking cognisance of the needs of students and staff with protected characteristics it does ensure that discrimination does not occur for any one group.

Step 2: (a) Consider the evidence and impact assess (Equality)

- (i) What data or evidence have you used to consider the impact of the policy on each Protected Characteristic group? E.g. student/staff demographic data, consultation responses, national data.
- (ii) If you lack data/evidence, please outline your plan for obtaining up-to-date data/evidence e.g. consultation, survey, focus group responses, national research.
- (iii) Referring to the evidence you have available, would this policy positively or negatively impact on the following Protected Characteristics groups? If so, then how? Detail how it would be possible to minimise negative impact (an action plan may be required to ensure minimal negative impact in practice/change an aspect of the policy). Refer to the following principles where possible: elimination of discrimination; advancing equality of opportunity; and fostering good relations.

Protected Characteristic	Evidence	Impact (and how to minimise negative impact).
Disability	Analysis of learner PI data by protected characteristics	Inclusion on SDS Equalities Action Plan of activities linked with Concept Northern and other community organisations to raise awareness of this protected characteristic

Gender	Analysis of learner PI data by protected characteristics	Activities targeted at specific gender groups to promote STEM/Engineering subjects to females and subjects such as care to males
Race (inc. nationality, ethnicity and language)	Analysis of learner PI data by protected characteristics	Inclusion on SDS EAP of activities linked with NBM and other community organisations to raise awareness of this protected characteristic
Age	Analysis of learner PI data by protected characteristics	Inclusion of the implementation plan for Developing the Young Workforce. Local Employability Partnership conference to examine DYW and Opportunities for All and subsequent college partnerships and provision
Gender re-assignment	Analysis PI data by protected characteristics	The Modern Apprenticeship section makes no reference to data regarding equalities profiles and the fact that, GA groups are under-represented on MAs
Sexual orientation	Analysis of learner PI data by protected characteristics	Inclusion on SDS EAP of activities linked with Stonewall and other community organisations to raise awareness of this protected characteristic
Religion or belief (inc. no belief)	Analysis of learner PI data by protected characteristics	Inclusion on SDS EAP of activities linked with Nil By Mouth to raise awareness of this protected characteristic
Pregnancy and maternity	Aspects of the EOP that could be strengthened or that impact negatively on protected characteristic groups	The Modern Apprenticeship section makes no reference to data regarding equalities profiles and the fact that, PM groups are under-represented on MAs
Other identified groups (e.g. carers)	Analysis of learner PI data by protected characteristics	Inclusion on SDS EAP of activities linked with community organisations to raise awareness of this protected characteristic (LYP/CL)

(ii) Action Plan to obtain data and evidence for impact assessment:

The strategy does not have any specific actions that would eliminate discrimination, however by taking into account the needs of students and staff with protected characteristics, it does ensure that discrimination does not occur for any one group. Actions to tackle under-representation identified above have been made more explicit.

Step 2: (b) Impact assess the policy in relation to Human Rights

Would this policy positively or negatively impact on the following Human Rights Articles? If so, then how? Detail how it would be possible to minimise negative impact (an action plan may be required to ensure minimal negative impact in practice/change an aspect of the policy). Refer to the following principles where possible: elimination of discrimination; advancing equality of opportunity; and fostering good relations.

Article	Value	Impact (and how to minimise negative impact).
3: The right not to be tortured or treated in an inhuman or degrading way	Dignity	Prevention of Harassment and Bullying Policy, the Student Discipline Procedure and the Hate Incident Monitoring procedure
6: The right to a fair trial	Fairness	Equalities & Student Engagement Committee oversees monitoring of this policy via regular meetings throughout the academic year and examines information and activities relating to specific equality work, as well as staff and student equality profiles
8: The right to respect for private and family life, home and correspondence	Respect	Equalities & Student Engagement Committee oversees monitoring of this policy via regular meetings throughout the academic year and examines information and activities relating to specific equality work, as well as staff and student equality profiles
14: The right not to be discriminated against in relation to the enjoyment of other human rights	Equality	Ensure that any incidences of bullying, victimisation, and harassment including third party harassment or discrimination including discrimination by perception or association are dealt with using the appropriate procedures

Step 3: Consultation

Is a consultation required? Are the views of other people required to be sought, in case they may highlight issues arising from the implementation of this policy?

Yes

No

Please provide reasons why you did/did not offer a consultation:

Consultation allowed for feedback to be considered, taking in the views of as many people as possible, not just relying on a few impact determinations. This has included contribution from Skills Development Scotland Modern Apprentice Skills Investment Advisor.

If 'yes', please complete the following sections.

Analysis of the views/evidence gathered from the consultation:

Review MA recruitment process. Impact assess the process regularly. Analysis of uptake of Equality and Diversity Training for MA delivery teams. Increase partnership working with local stakeholders to engage with employers who have not considered MAs for their business, to inform the support available to employers, to attract a more diverse workforce and broaden their talent pool, that is also inclusive of PCs and to identify the networks that are available for them to support successful employment and progression.

Recommendation(s):

1 A short review of current college policies (practices and procedures) should be undertaken to update the current position on college approach including informal custom and practices across Modern Apprenticeship provision.

2 Actions to tackle gender and under-representation should be more explicit.

3 Establish a mechanism that includes additional equality considerations in self-Evaluation.

Business Development have reviewed all of the processes used with MAs to ensure that they are inclusive and informs additional support needs and reasonable adjustments. Through our Skills Development Equalities Action Plan FVC has identified a number of key actions in relation to under representation aligned to SDS key specific action themes (appendix 1).

Progress to date includes dedicated pages on the FVC website for prospective MAs and employers focusing on support available to LAYP/CL, showcasing our commitment to improving the gender imbalance and increasing female participation within Construction and Engineering. The FVC website now has dedicated MA pages for prospective MAs, parents and guardians and employers.

Although these pages will be applicable to all they have a particular focus on support available to LAYP/CL and showcase our commitment to increase the number of MAs working within areas traditionally dominated by the opposite sex, as well as providing information on opportunities available, these pages act as landing links to external support and opportunities e.g. SDS My World of Work.

Step 4: Decision Making

Select an option to summarise how the IA has informed your decision-making:

- 4.1 No amendment to the policy is required (policy is robust, with no negative impact);
- 4.2 Adjust the policy (take steps to meet the general duty and reduce negative impact);
- 4.3 implement the policy without adjustment (continue despite the potential for adverse impact);
- 4.4 Stop and remove the policy (where adverse effects are not justified and cannot be mitigated or where the policy leads to unlawful discrimination).

The plan is robust and makes many references to how the college is meeting its duty to advance equality of opportunity.

This Policy has been screened to determine equality relevance for people with the following protected characteristics: disability, race, age, gender, religion and belief, sexual orientation and other groups.

Some aspects of the plan could be strengthened to reflect areas where it has been identified as having the potential to negatively impact on protected characteristic groups within MA provision in relation to pregnancy/maternity and gender reassignment.

Step 5: Publication:

Equality & Human Rights Impact Assessments must be published.

	Does this group need to be aware of this EHIRA? (tick if applicable)	How to inform this group:
Students (service users)	<input checked="" type="checkbox"/>	Through listening to learner forums
Employees	<input checked="" type="checkbox"/>	Formal equalities monitoring meetings
Partner organisations & stakeholders	<input checked="" type="checkbox"/>	SDS Equalities Action plan review meetings with SIA
Other - please state:	Click here to enter text.	Click here to enter text.
Are there any barriers to communication?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If 'yes', how will barriers to communication be overcome? Click here to enter text.		

Step 6: Monitoring and Review

How will this policy be monitored to assess its impact on Protected Characteristics groups and Human Rights? E.g. will qualitative/quantitative data be collected? Survey, Student Council, Listening to Learners sessions? Through our Skills Development Equalities Action Plan FVC has identified a number of key actions in relation to under representation aligned to SDS key specific action themes, reporting on performance indicators through both quantitative and qualitative monitoring activities. A review of listening to learners process and how we engage with both college and work based MAs will ensure that they have an opportunity to shape course provision in relation to equality and human rights. This will be reviewed for SDS contract year in Oct 2017. Evidence of equality and diversity targets in all operational plans and PRDs.	
Staff member/designation responsible for writing the monitoring report:	Charlene Archibald
Monitoring report publication date:	31/05/2017
Review date: (no later than 3 years after the policy has been impact assessed)	30/10/2017

Please send the completed impact assessment to equality@forthvalley.ac.uk

If you require any assistance in completing a Equality & Human Rights Impact Assessment, please contact equality@forthvalley.ac.uk

EHRIA

Appendix 1



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