

Disability Discrimination Act and Work Based Learning



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Name of project: Guidance for Employers – effective support for apprentices with Disabilities

Organisation: Manchester Solutions

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The main criterion for including projects on this website is that they are all developmental or case study research projects undertaken as part of DDA: improving work-based learning for people with learning difficulties and/ or disabilities. The overall aim of this project was to support work-based learning providers to respond to the DDA. Project reports do not necessarily reflect good or best practice.

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1. Introduction

1.1 Manchester Enterprises (ME) is the economic development agency for Greater Manchester. It holds a substantial contract for the delivery of LSC-funded programmes, which it delivers through its operating companies and other sub-contractors. Within the ME group are two operating companies who specialise in the delivery of LSC and Jobcentre Plus funded programmes:

- **Skills Solution** – delivery of Apprenticeship programmes in a wide range of occupational frameworks.
- **Employment Regeneration Partnership (ERP)** – focuses on worklessness and delivers employability and Basic Skills programmes to a wide range of adults in a variety of settings and E2E (Entry to Employment) programmes.

1.2 The project focused on provision delivered by the two organisations. However, the diversity and nature of the ME operating company operations provided an opportunity for a wider sharing of the findings and outcomes of the project. For example, learndirect (ME is the Hub Operator), nextstep (ME holds the contract for GM), EDU (Employer Development Unit) and other various sub-contractors were represented on the steering group. Each was able to contribute ideas and information about their current practice.

1.3 Within ME, there exists the **Contracted Learning and Skills Programme (ClaSP) Unit** which monitors the performance and quality of the contracts that it holds with LSCGM through contract management of its subcontractors (including the ME operating companies that deliver the programmes).

1.4 Clear benefits have arisen from the establishment of the ClaSP Unit which specifically impact on the improvement in equality and diversity issues. The Quality Improvement Manager has a broad overview of activity in each of the operating companies and, as a result, has been successful in bringing together a variety of approaches to equality and diversity which are now beginning to impact.

2. Background to the Project – the rationale

2.1 It is useful to provide some background to both organisations in terms of equality and diversity actions which helps illustrate the purpose of the two projects. This is outlined below under Skills Solution and ERP.

2.2 Skills Solution

In the ALI Inspection of Skills Solution (09.03), two key weaknesses were identified:

- **poor understanding of EO by learners**
- **weak monitoring of EO in the workplace.**

A key challenge was identified - **improve the monitoring of equal opportunities in the workplace.**

Skills Solution's EO & Diversity Group, in its development plan for 04-5, identified two key actions to address the weaknesses:

1. Improve Monitoring of EO in the Workplace

Action under the project: a revised Employer Toolkit (with an EO section) was produced jointly between Skills Solution and ERP.

2. Review staff training programme for EO during 04

To improve the knowledge and confidence of employer-facing staff in equal opportunities, EO updating training was held for all staff and included bullying and harassment, disability awareness, dyslexia and implications of DDA for employers and training providers.

Action under the project: further DDA-specific training provided to staff during 2005.

In the subsequent ALI re-inspection (Hairdressing) of Skills Solution (11.04), a single weakness was found:

- **Weak promotion of equal opportunities with employers and learners**

Action under the project: worked with an LSDA consultant to explore strategy for improving monitoring with employers. Training events held with employer-facing staff. Production of an employer guide to equality and diversity and the DDA. A revised learner guide to equal opportunities.

2.3 ERP

In the ALI Inspection of ERP (05.05), the key weakness under equal opportunities was:

- **Insufficiently developed arrangements for monitoring equality practices in the workplace**
- **Insufficient analysis of data for equality of opportunity**

However, the ALI Inspection Report for ERP (05.05) recognised that:

- *ERP has a very good strategic approach to widening participation of learners from under-represented groups which includes clear targeting of these groups.*
- *Seventeen of ERP's 22 training centres are located in the top 10 percent most deprived wards in England.*
- *ERP has an open door policy for learners, many of whom have significant personal and social barriers to gaining employment*
- *ERP has developed a extensive range of effective strategic partnership to promote participation from under-represented groups*
- *Partnership with a local NHS trust resulted in unemployed adults from minority ethnic groups gaining employment*
- *Another project targets adults over 50 years of age*

- *ERP operates a social employment agency (ASPIRE) that particularly supports disadvantaged people into jobs.*
- *Further work supports learners' transition from prison into ERP's programmes.*

3. Conclusions leading to the projects.

3.1 There are many good examples of widening participation by both organisations, some of which have been confirmed during ALL inspections. Both organisations (and Skills Solution in particular because of its essential relationship with employers in Apprenticeships) believe that a key success factor lies in improving *employer engagement*. However, it has long been recognised that the majority of employer-facing staff lack confidence in discussing equality and diversity issues with employers.

3.2 ALL inspection reports do not dismiss the very good work that both organisations carry out in terms of widening participation. The weakness relates to *how* data is analysed to identify trends and used as a benchmark to set targets for proactive measures that lead to improvement. This necessitated a more systematic approach to the analysis of learner participation and achievement through an agreed framework.

3.3 Equality and Diversity Impact Measures (EDIMs) were introduced in 2001 as a mechanism to measure participation levels by under-represented groups in lifelong learning and, in particular, work based learning. Local targets were set and monitored by local LSCs and provider performance monitored against them.

3.4 EDIMs have been the subject of on-going improvement actions for Skills Solution and ERP since 2003. Closer monitoring of targets set against LSCGM's EDIMs was an on-going issue being addressed by both Skills Solution and ERP and identified in their development plans. Both organisations are in the process of implementing the new MAYTAS MI system and discussions have taken place for improved reporting against identified classifications of learners.

3.5 During 2005, both organisations implemented the MAYTAS MI system. Over the past year, significant progress has been made for improved reporting and analysis of participation and achievement rates.

3.6 As there are clear similarities between the weaknesses of the two organisations, it was decided that a joint cross-company approach would be beneficial. Two projects were discussed with senior management in both organisations and linked to their development plans. :

- **Design of an employer awareness raising seminar and the development of a brief guide to DDA.**
- **A survey-based project leading to the establishment of a framework for improved data analysis.**

4. Progress

The table below highlights, in chronological order, the key milestones achieved (including impact) during the lifetime of this project.

Action	Date	Impact
Review Equal Opportunities Policies, summary statements inc. Disability Statements within each operating company.	05.05	Updated information with summaries for staff, employers and learners, as appropriate.
Initial meeting with LSDA allocated consultant.	Summer 05	Helped to scope the project and identify what was and was not achievable within the timescale.
New MAYTAS MI system introduced in 2005.	Mid 2005	Opportunity to improve reporting mechanisms to enable systematic analysis of data for equality and diversity.
A dedicated equality and diversity webpage on Skills Solution's newly redesigned website with similar plans for ERP.	08.05	Information on EO more readily accessible to employers and learners via the website: www.skillssolution.co.uk
An updated joint Skills Solution and ERP Employer Toolkit with an improved section of equality and diversity and an employer E&D 'self-check' questionnaire.	09.05	Improved focus on E&D at initial sign-up with employers.
A joint Skills Solution and ERP steering group to address equality and diversity issues and oversee the project.	10.05	Group also included representatives from learndirect, East Manchester Partnership, nextstep which encourage sharing of good practice and exchange of information.
ME Learner Guide to EO produced and distributed	10.05	Found to be too long for shorter courses; led to development of a brief guide for learners. (See Appendices 1 & 2)
Staff development programmes: Deaf Awareness/sign language/dyslexia awareness/dyslexia support training (LSC funded)	05-6	Updating training provided to staff. Identified need for further updating training on DDA for some staff and incorporated into the staff development programme.

		Some staff lack confidence in discussing equality and diversity issues with employers.
First draft of Employers Guide to Equality presented to E&D Group.	10.05	Group decided guide was too long and proposed a briefer version. LSDA consultant suggested a 'suite' of guides be produced and updated, as necessary.
E&D Group discussed selection of 'pilot' employers for E&D workshop	10.05	First employers identified 01.06. Joint event of Skills Solution, ERP and EDU employers planned for 04.06.
Final draft of Employer Guides: Equal Opportunities DDA E&D	02.06	To be launched at the Employer E&D Seminar 04.06. (See Appendices 3,4 & 5)
Draft framework produced for analysis of data for E&D.	12.05	Opportunity to compare practice between operating companies. Opportunity to improve supplier approval process and monitoring documentation relating to equality and diversity procedures. (See Appendix 7)

5. Conclusion

Project 1

Design of an employer awareness raising seminar and the development of a brief guide to DDA.

5.1 Skills Solution introduced a learner guide to equal opportunities in 2003. This was based on the (then) current legislation and has been systematically used during learner induction programmes to improve awareness of equal opportunities issues. The pack contained tasks for learners to complete at a later date and a questionnaire which is reinforced at learner progress reviews. This has, in general, been satisfactory in ensuring that equal opportunities is addressed as a on-going process of education. In certain occupational areas, equal opportunities is included in the core curriculum; whereas in others it is not.

5.2 The project necessitated an evaluation of the learner guide with particular emphasis on strengthening sections relating the DDA and diversity in general. It was agreed that the guide would be retained and updated and that it had a key place in

longer programmes such as Apprenticeships. However, it was piloted with shorter programmes e.g. learndirect and found, due to the time constraints of short courses, to be too detailed in its coverage (a comment made an ALI inspector during the Inspection of ME Hub Operator (11.05). A summary sheet was devised as a 'stop-gap' and a decision was made to produce a short Learner Guide to EO and made available to all learners/clients receiving services from ME companies. **(See Appendix 1)**

5.3 The employer toolkit was revamped and updated to include an equality and diversity section with more comprehensive coverage. In addition, a 'self-check' questionnaire was included for employers, as organisations, to complete. Although this relates more to the HR function of an organisation than to the training and development of staff through government funding, it was considered an important opportunity to promote equality and diversity. There will, undoubtedly, be a need to train employer-facing staff in the use of the employer toolkit.

5.4 The first draft guide for employers on equal opportunities proved to be too lengthy and unlikely to interest employers. The LSDA consultant suggested a 'suite' of guides that could be produced and updated and/or added to, as necessary. It was agreed that initially three guides would be produced; Equal Opportunities, Equality and Diversity and a simple guide to the DDA. These would be in simple A5 'flier' format with key bullets in understandable terms. **(See Appendices 3,4 & 5)**

5.5 Several employers were consulted about their possible interest in a seminar. Traditionally in work based learning, it is difficult to attract employers to provider events unless there is something of specific interest that they perceive as having positive benefits for their businesses. Of those consulted, the majority agreed that the main theme should be the implications of the DDA for employers. With this in mind, the first of series of short seminars has been designed and will commence in April 2006. A specialist trainer with a broad experience of the DDA and implications within both employment and education will deliver half day interactive workshops. The workshops will include the use of case-studies, questionnaires and discussion sessions.

6. Project 2

A survey-based project leading to the establishment of a framework for improved data analysis.

6.1 Both Skills Solution and ERP have effective strategies for widening participation. Skills Solution recruits a large proportion of its apprentices from some of the most deprived wards in Greater Manchester. ERP contracts to deliver E2E (Entry to Employment) programmes and Job Centre Plus New Deal programmes (aimed at tackling worklessness). It therefore actively targets many groups under-represented in learning e.g. probationers, prisoners and ex-offenders, minority ethnic and disabled people. Many of its clients have basic literacy and numeracy needs. Amongst the strategies is an extensive range of effective strategic partnerships to promote participation from under-represented groups.

6.2 Despite this, there has been insufficient analysis of data for equality for opportunities (according to ALI Inspection Reports). The root cause lies in the systems used for the collection of data. Data is collected from personal information provided by learners upon commencement of their programmes. This is collected against the 'approved' list of categories required by the LSC and Job Centre Plus. A further point of consideration is that not all learners feel comfortable about declaring a disability for fear of not being accepted on to their chosen programmes.

6.3 ME has implemented a new MI system (MAYTAS) which offers considerably more scope for analysing data. A framework has been developed which is designed to capture a broader range of information than previously possible. **(See Appendix 7)**. This will enable senior managers and programme managers to identify those programmes where there is under-representation by specific groups of learners. The statistics can be compared to local EDIM targets and key performance indicators for improvement put in place. Furthermore, the new MI system will enable comparative data to be made available that illustrates the differences in rates of achievement by different groups of learners. This developmental work will continue during 2006.

7. Evaluation

7.1 Positives

- Establishment of a cross-ME steering group to explore E&D issues.
- Sharing of information and good practice between the operating companies.
- Opportunity to improve supplier approval process and contract monitoring documentation relating to equality and diversity procedures.
- Opportunity to address some of issues highlighted in ALI inspections.

7.2 Issues

- Ensuring a broad representation from each operating company / subcontractor within the ME group.
- Gaining commitment to the project.
- Time in ensuring a successful project.
- Maintenance and ownership of on-going evaluative and developmental work.

7.3 Recommendations

- Both organisations provide training for employer-facing staff in use of the Employer Toolkit and build confidence in discussing Equality and Diversity issues.
- Both organisations sign up to the implementation of a common framework for the collection and analysis of data for equality of opportunity.
- Roll-out a series of short seminar workshops for employers.

Appendix 1

Learner Guide to EO

x 2

Appendi

EO Learner Pack

Appendix 3

Employer Guide (1) to Equal Opportunities

x 4

Appendi

Employer Guide (2) to Equality and Diversity

Appendix 5

Employer Guide (3) to the DDA

Appendix 6

Learner Case-study

Appendix 7

ERP Framework for collection and analysis of data

Categories:

Health Conditions Disability (by type)

Diseases of the respiratory system (not TB)
Diseases of the heart and circulatory system
Other
Diseases of the digestive system
Learning difficulties
Arthritis and rheumatism
Organic nervous diseases in epilepsy, CP
Injuries of the heads, face, neck, thorax, abdomen etc.
Amputation
Mental disorders
Eye defects
Injuries, diseases and deformities of the spine
Ear defects
Diseases of the skin

This has now been renamed Health Conditions. The list is still current. However it is still likely to change (currently Work In Progress). Any changes will still capture the above headings, but there may be additional Health Conditions and/or rename the above to more user-friendly options.

Ethnicity

Bangladeshi
Indian
Pakistani
Other- Asian
Black – African
Black – Caribbean
Black –other
Chinese
Mixed – White and Asian
Mixed – White and Black African
Mixed – White and Black Caribbean
Mixed - any other mixed background
White – British
White – Irish
White – Other
Other
Not known/not provided

ERP has been collecting the above information for approx 6 years (when Client Tracking System was introduced to ERP). It currently analyses data by ethnicity, disability against Starts, Jobs and Qualifications s (where appropriate). In addition, ERP is in the process of reviewing its Equal Opportunities data by Local Authority. ERP is using ME Research team to improve the graphical presentation of the data.

Data on participation rates has been issued to ERP Programme and Team Managers. Discussion has taken place as to whether the targets were a correct representation of the client group/s. Except for gender, these figures have been agreed with ERP Board, so are current for the year. The gender targets have since been reviewed and changed, liaising with managers as appropriate.