

Report



Cabinet Member for Education and Skills

Part 1

Date: 25 May 2018

Subject **European Social Fund Bids**
Priority Axis 1 – Tackling Poverty through Sustainable Employment

Purpose Update and seek approval from the Cabinet Member to commence formal delivery of the European Social Fund (ESF) Journey 2 Work Operation within the South East Wales region. The Operation will commence delivery upon approval of the formal Business Plan by the Welsh European Funding Office (WEFO).

Author Work, Skills and Performance Manager

Ward City Wide (non-Communities First areas)

Summary In October 2015 a Cabinet Member Report was approved supporting Newport City Council's application to the European Social Fund for the Inspire 2 Achieve, Inspire 2 Work and Journey 2 Work Operations on behalf of the associated Joint Beneficiaries (partner organisations) within the South East Wales region. Newport City Council is the Lead Beneficiary (lead organisation) for the Inspire 2 Achieve and Inspire 2 Work Operations and is also proposing to be the Lead Beneficiary for the Journey 2 Work Operation, managing the delivery and performance of the Joint Beneficiaries across the region.

Newport City Council gained approval from WEFO for the Inspire 2 Achieve Operation in April 2016 and the Inspire 2 Work Operation in March 2017.

The Journey 2 Work Operation led by Newport City Council, will include the following Joint Beneficiaries:

- The City of Cardiff Council
- Newport City Council
- Monmouthshire Housing Association

The Operation will be delivered across the Local Authority areas of Cardiff, Monmouthshire, and Newport, and brings together a collaborative multi-agency partnership made up of Local Authorities and Registered Social Landlords to provide a comprehensive package of support to those aged 25 and over who are furthest from the labour market. The target groups will be those as set out in the ESF Operation Programme for East Wales:

- Economically Inactive (aged 25 and over) not in education or training who have complex barriers to employment
- Long-term unemployed (aged 25 and over), who have complex barriers to employment

Newport Delivery

Newport City Council's Work and Skills team will deliver the Journey 2 Work operation within the Newport.

The Journey 2 Work delivery team within Newport City Council's Work and Skills team will consist of the following posts:

- Economic Inactivity Worker 4.3 FTE
- Co-ordinator 0.4 FTE
- Work, Skills & Performance Manager 0.2 FTE
- Finance & Monitoring Manager 0.2 FTE

Newport City Council will support residents aged 25 years old and over living in non-Communities First areas focussing on the below wards; however it is important to note that residents living outside of the current Communities First postcodes/LSOA will also be eligible for support through the Journey 2 Work Operation.

- Allt-yr-yn
- Beechwood
- Caerleon
- Graig
- Langstone
- Marshfield
- Rogerstone
- St Julians

Participant Outcomes

The Journey 2 Work Operation in Newport delivered by Newport City Council will aim to achieve the following outcomes for residents:

Economically Inactive and Long Term Unemployed individuals (aged 25 and over) not in education or training who have complex barriers to employment engaged	220
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment entering employment including self-employment upon leaving	15
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment engaged in job search upon leaving	60
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment gaining a qualification or work relevant certification upon leaving	36
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment increasing employability through completing work experience placement or volunteering opportunity	64
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment in employment including self-employment 6 months after leaving	6
Long-term unemployed (aged 25 and over) who have complex barriers to employment entering employment, including self-employment, upon leaving	15
Long-term unemployed (aged 25 and over) who have complex barriers to employment gaining a qualification or work relevant certification upon leaving	30
Long-term unemployed (aged 25 and over) who have complex barriers to employment increasing employability through completing work experience placement or volunteering opportunity	45
Long-term unemployed (aged 25 and over) who have complex barriers to employment in employment including self-employment 6 months after leaving	9

NCC Finances

Based on the funding rationale the Newport City Council Journey 2 Work delivery team will engage with 220 participants achieving 280 outcomes over the 3 years as detailed in the table above. The Operation in Newport will have a total value of £542,769, made up of £238,593 ESF Grant and £304,176 of match funding as detailed in the below tables:

J2W Operation	Year 1	Year 2	Year 3	Total
Total Operation Cost	225,071	232,020	85,679	542,769
Match funding	125,035	128,892	50,250	304,176
ESF Grant	100,036	103,128	35,430	238,593

The Journey 2 Work Operation will contribute £71,455 ESF Grant per year for the salary costs of the below posts, with the remaining £30,165 per year used for operational delivery costs:

- Journey 2 Work Economic Inactivity Workers x 2 FTE
- Journey to Work Co-ordinator 0.4 FTE

The above Economic Inactivity Worker posts will be filled by re-deploying from existing Community Regeneration staff or recruited externally by Newport City Council, to provide 1 to 1 employment support to the participants engaged and continue delivery of the sustainable employment agenda through the J2W Operation.

Initially the J2W Co-ordinator post will be filled by re-deploying from existing Community Regeneration staff (2 x Work and Skills Coordinators), however due to the additional responsibilities it is proposed that the post will be re-submitted for regrading as an Operational Manager role (Grade 8).

Year 1 – Summary of Match Funding

Match funding sources	Availability of match	Value	Rationale
Work Programme contract income	Annual	£89,311	2.43 FTE Economic Inactivity Workers 0.2 FTE Work and Skills Performance Manager 0.2 Finance & Monitoring Manager
FR40 Model	Annual	£35,724	WEFO Simplified Costs Option Model
Total		£125,035	

The match funding for Year 1 will be provided from core Council expenditure, funded from contract income generated by the DWP Work Programme. This match funding is only guaranteed for Year 1 of the programme and will not be available for future years. Whilst it is anticipated that alternative sources of match funding will be secured for the remainder of the programme (eg City Deal, Communities for Work Plus, Working Wales), at the time of writing this report, this new funding has yet to be agreed.

In order to mitigate this risk for the Council, the Journey to Work Programme for Years 2 and 3 will mirror the match funding available, if less (or no) match funding is available for future years, the NCC Delivery part of the programme will be reduced or ended early.

Any new appointments made in Year 1 (funded from the grant) will be on a fixed term basis to the 31st March 2019, with an extension to Years 2 and 3 dependent on alternative match funding source being secured.

An additional risk arising from the NCC J2W local delivery reducing or ending at the end of Year 1 is that the Council will still be liable, as per the terms of the Relationship Agreement, for the full contribution to the Central Lead Team for the remainder of the operation. Over the lifespan of Journey 2 Work operation, the Council is due to contribute approximately £23k to the Central Lead Team, with approximately £14k of this

contribution due in Years 2 and 3. In the unlikely event of the programme ending early, this liability will be funded by offsetting savings made elsewhere in the Work and Skills budget, plus any FR40 monies left at the end of Year 1.

Proposal Seek approval from the Cabinet Member for Newport City Council to act as Lead Beneficiary and as a Joint Beneficiary for the European Social Fund Journey 2 Work Operation.

Action by Head of Regeneration Investment and Housing

Timetable In December 2014 the consortium of South East Wales Regional partners submitted an Operational Logic Tables (OLT) to the Welsh European Funding Office (WEFO) for the Inspire 2 Achieve, Inspire 2 Work and Journey 2 Work Operations.

The OLTs provided a basic specification for each Operation, acting as an expression of interest to progress the development of a more detailed application. In 2015, the Welsh European Funding Office asked the regional partners to submit further detail in the form of a formal Business Plan; these have been developed in several stages and in consultation with delivery partners, regional partnerships and WEFO Officers.

Following Cabinet Member approval in October 2015, financial and delivery proposals for the three Operations were submitted to WEFO.

Newport City Council received confirmation from WEFO of formal approval of the Inspire 2 Achieve Operation on the 1st April 2016 and for the Inspire 2 Work Operation on the 17th March 2017.

WEFO have provided Newport City Council with a profiled start date for the Journey 2 Work Operation of the 1st November 2017 resulting in an end date of the 30th October 2020 (36 months). WEFO have approved retrospective funding back to the 1st November 2017 if any delays in approval and receipt of the Grant Offer Letter.

The report was prepared after consultation with:

- Cabinet Member for Education and Skills
- Strategic Director - Place
- Head of Regeneration, Investment and Housing
- Head of Law and Regulations – Monitoring Officer
- Head of Finance – Chief Finance Officer
- Head of People and Business Change
- LSKIP (Learning Skills and Innovation Partnership)
- Cardiff City Region Proofing Board
- Local Authority Partners
- FE College
- Registered Social Landlords
- Third Sector Organisations
- WEFO (Welsh European Funding Office)
- SWYP Group (Skills, Work and Young People)
- Welsh Government (DfES)
- Careers Wales
- Youth Support Services Board

Signed

Background

The Council's Improvement Plan, Regeneration, Investment and Housing Service Plan and Economic Growth Strategy highlight young people not in education, employment and training (NEET), sustainable employment, raising of qualification levels and increased skills as priorities for development. These are the key priorities within the European Social Fund (ESF) Operations that NCC are either delivering currently or developing for future delivery.

The priorities highlighted by Newport City Council are also key priorities for other Local Authorities across the region as identified by the Learning Skills and Innovation Partnership (LSKIP) South East Wales document (Attached within appendix 3)

European Social Funding across Wales is split into two distinct funding regions, West Wales and the Valleys and East Wales. Categorisation of each area is derived from GDP per capita compared to the EU average, and denotes the level of funding available.

The West Wales and the Valleys areas have access to greater levels of European Funding due to the area having higher levels of deprivation. The breakdown of Local Authority areas covered in South East Wales within the West Wales and the Valleys and East Wales regions is as below;

- West Wales and the Valleys: Caerphilly, Torfaen, Blaenau Gwent, Merthyr Tydfil, Bridgend, and RCT.
- East Wales: Newport, Cardiff, Vale of Glamorgan and Monmouthshire.

A South East Wales ESF group was established by NCC, with the purpose to identify need across the region, and develop ESF funding bids to address this need. Through the East Wales working group, it was agreed that 3 proposed Operations would be developed that would look to address young people who are NEET, young people at risk of becoming NEET and those aged over 25 who are at risk of poverty.

It was also agreed that each Joint Beneficiary would be responsible for providing the required match funding and the evidence proving its eligibility for use on an ESF Operation. All Joint Beneficiaries will be responsible for monitoring their expenditure and ensuring the match funding is recorded appropriately and in line with WEFO guidance (this will be identified in a Relationship Agreement between all Joint Beneficiaries and Newport City Council as the Lead Beneficiary). Newport City Council as the Lead Beneficiary will be responsible for monitoring and validation of the information supplied by the Joint Beneficiaries before it is submitted to WEFO, the Central Lead Team have been recruited for this purpose.

All partners have identified eligible sources of match funding, however as discussed with WEFO the Operation is unable to secure this funding for the full 3 years of the Operation (due to external funding being used as match that is agreed annually). The Operation has been advised to identify match funding that will be available for year 1 and make assumptions for years 2 and 3. Match funding sources and time scales will therefore be subject to change throughout the lifetime of the Operation and confirmed annually by the Central Lead Team. If during the Operation a Joint Beneficiary has to withdraw their match funding and are unable to secure an alternative source they will be required to scale back their Operation accordingly, re-profiling their financial expenditure and outcomes. All Joint Beneficiaries are required to provide evidence supporting the use of the funding source as match funding for the ESF Journey 2 Work Operation.

ESF Programmes

Journey 2 Work

The Journey 2 Work operation is seeking funding from Priority Axis 1 of the WEFO East Wales Operational programme which is Tackling Poverty through Sustainable Employment, Specific Objective 1 which sets out to increase the employability of Economically Inactive and Long Term Unemployed people aged 25 and over, who have complex barriers to employment.

The Operation will be delivered across the Local Authority areas of Cardiff, Monmouthshire, and Newport, and brings together a collaborative multi-agency partnership made up of Local Authorities and key support agencies to provide a comprehensive package of support to those aged 25 and over who are furthest from the labour market. The target groups will be those as set out in the ESF Operation Programme for East Wales:

- Economically Inactive (aged 25 and over) not in education or training who have complex barriers to employment
- Long-term unemployed (aged 25 and over), who have complex barriers to employment

Newport City Council will deliver the Operation within the Newport Local Authority area utilising its experienced Work and Skills Team.

Through a 'person centred' approach, (this can be delivered through 1 to 1 support or group activities) the operation aims to engage, support and enable unemployed and economically inactive 25 years and over to gain a range of skills, qualifications and meaningful work placements to feel confident and motivated to enter into sustainable employment or further learning. Taking into account that the target groups have a number of barriers preventing them from entering employment or further learning, therefore the preferred delivery option gives the support and flexibility enabling the participant to succeed.

The Operation has been designed to ensure that those aged over 25 years of age living within non Communities First areas who are at risk of poverty have access to similar support and interventions, which will help them overcome barriers to gaining sustainable employment, as those living within Communities First areas.

The proposed outcomes for Journey 2 Work are as follows:

Regional Delivery

Regional outcomes over 3 years

Economically Inactive and Long Term Unemployed individuals (aged 25 and over) not in education or training who have complex barriers to employment engaged	820
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment entering employment including self-employment upon leaving	162
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment engaged in job search upon leaving	73
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment gaining a qualification or work relevant certification upon leaving	197
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment increasing employability through completing work experience placement or volunteering opportunity	122
Economically inactive (aged 25 and over), not in education or training, who have complex barriers to employment in employment including self-employment 6 months after leaving	36
Long-term unemployed (aged 25 and over) who have complex barriers to employment entering employment, including self-employment, upon leaving	137
Long-term unemployed (aged 25 and over) who have complex barriers to employment gaining a qualification or work relevant certification upon leaving	72
Long-term unemployed (aged 25 and over) who have complex barriers to employment increasing employability through completing work experience placement or volunteering opportunity	93
Long-term unemployed (aged 25 and over) who have complex barriers to employment in employment including self-employment 6 months after leaving	35

The regional Journey 2 Work Operation total value is £2,514,246 over the 3 years and is made up of £1,243,841 ESF Grant and £1,270,405 of match funding, giving an Intervention Rate of 49.47%. The Operation is proposing to support 820 participants, leading to 927 outcomes across the South East Wales region as broken down in the table above. The Operation has produced a unit cost of £3,066 per participant.

Participant targets and outcomes have been determined by Joint Beneficiaries through local consultation, data gathering and statistical research. The level of impact required to reduce the number of those aged 25 and over who are unemployed and at risk of poverty has been gathered through wider consultation, source documentation and engagement with Jobcentre Plus, Local Authorities, Registered Social Landlords and LSKIP.

Financial and participant outcome data provided is based on accurate and up to date information, however this can be subject to change until the Operation is formally approved by WEFO. These changes will be communicated through cabinet member briefings and further reports.

Central Lead Team

The Central Lead Team, employed by Newport City Council is 100% funded through the ESF Grant and currently consists of the following roles that manage the delivery and monitor performance of the Joint Beneficiaries within each Operation:

- Inspire Central Lead Manager
- Inspire Central Lead Finance, Monitoring & Governance Officer x 2
- Inspire Central Lead Administrator

The Journey 2 Work Operation will provide funding for an additional Central Lead Finance, Monitoring & Governance Officer post and contribute to the current Central Lead Team posts, resulting in the below Central Lead Team structure.

- Inspire Central Lead Manager
- Inspire Central Lead Finance, Monitoring & Governance Officer x 2
- Inspire Central Lead Administrator
- *Journey 2 Work Central Lead Finance, Monitoring and Governance Officer*

All Central Lead Team posts will be 100% funded by the ESF Grants provided through the Inspire 2 Achieve, Inspire 2 Work and Journey 2 Work Operations and recruited on a fixed term contract up until the end of the Operation.

A summary of the Journey 2 Work Operation is included in the background section of this document.

As the Lead Beneficiary for the Journey 2 Work Operation, Newport City Council will be responsible for managing the performance of the Operation and overseeing the delivery of each Joint Beneficiary. This includes:

- Managing performance of Joint Beneficiary progress towards operational targets as agreed with the Welsh European Funding Office (WEFO).
- Completion of regular monitoring and compliance checks ensuring Joint Beneficiaries adhere to WEFO guidance.
- Reporting and submission of participant outcomes and financial expenditure to WEFO Project Delivery Officers and via WEFO online.
- Collation and storage of required documentation to evidence participant outcomes and financial expenditure.
- Correspondence with WEFO to resolve queries and distribution of information to Joint Beneficiaries.
- Communication with all Joint Beneficiaries on a regular basis ensuring WEFO updates and guidance are received.

- Preparations for WEFO claim verifications and European Funding Audit Team inspections.
- Development of legal agreements between Newport City Council as the Lead Beneficiary and the individual Joint Beneficiaries.
- Creation of a regional procurement framework where appropriate and monitoring of Joint Beneficiary procurement activity.
- Ensure the Operation is adequately promoted and all marketing adheres to WEFO guidelines.

Bid Approval

The Welsh European Funding Office has approved the Business Plan allowing delivery to commence as profiled from the 1st November 2017. Joint Beneficiaries delivering from this date and prior to Cabinet approval by NCC and signing of the WEFO Grant Offer letter will be provided retrospective funding ensuring the full ESF grant as profiled is received.

Financial Summary

As the Lead Beneficiary NCC will be responsible for submitting the expenditure and outcomes achieved by the Joint Beneficiaries but will mitigate any risk by indemnifying ourselves against any undesirable actions by the Joint Beneficiaries through a robust legal agreement (Relationship Agreement, produced for use on the I2A and I2W Operations). The Relationship Agreement will place the responsibility of eligibility of match funding, outcomes and all financial expenditure with each individual Joint Beneficiary. The costs associated with NCC being Lead Beneficiary and employing the Central Lead Team will be fully recovered from the ESF Grant and contributions made by the Joint Beneficiaries.

As noted in 1.7, all Joint Beneficiaries have identified sources of match funding that will be eligible for years 1, 2 and 3 of the Operation, but may not have been able to confirm this match for years 2 and 3. Therefore match funding sources and time scales may be subject to change throughout the lifetime of the Operation. If during the Operation any partner has to withdraw their match and is unable to secure alternative funding they will be required to scale back their Operation accordingly, re-profiling outcomes and expenditure. Any surplus ESF Grant may be redistributed (re-profiled) to other Joint Beneficiaries subject to them providing additional match funding or returned to WEFO if not required.

Regional value and Match Funding breakdown

J2W Operation	Year 1	Year 2	Year 3	Total
Total Operation Cost	814,340	919,045	780,862	2,514,247
Match Funding	411,472	464,377	394,556	1,270,406
ESF Grant	402,868	454,667	386,306	1,243,841

The Journey 2 Work Operation contributes £198,102 ESF Grant to the Central Lead Team of which £141,502 will provide a 11.08% contribution towards the Central Lead Team Manager and Administrator posts and 100% for the new Finance, Monitoring and Governance Officer Post, over the 3 years, with the remaining £56,600 used for operational delivery costs.

The apportionment methodology approved by WEFO leading to the 11.08% contribution for the Central Lead Team posts has been derived from the combined number of participants that are planned to be supported by all 3 Operations. The Inspire 2 Achieve, Inspire 2 Work and Journey 2 Work Operations have proposed to support a combined total of 6862 participants, with the latter supporting 820 participants equating to 11.08% of the total.

J2W Operation	Year 1	Year 2	Year 3	Total
Total	66,034	66,034	66,034	198,102
ESF Grant	32,668	32,669	32,668	98,005
Contribution by Joint Beneficiaries	33,366	33,366	33,366	100,098

The Relationship Agreement will ensure there is a contractual legal agreement between the Lead Beneficiary and each Joint Beneficiary to ensure contributions are provided for the Central Lead Team costs.

Risks

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
NCC not acting as the Lead Beneficiary resulting in the J2W Operation not being approved	H	H	By taking the Lead Beneficiary status we are protecting this opportunity for NCC and the Joint Beneficiary partners across the region.	Community Regeneration Manager
J2W Operation not approved by the Welsh European Funding Office	L	M	NCC Officers are in regular communication with WEFO and Joint Beneficiary partners to ensure issues are resolved in a timely manner and the data submitted is accurate.	Work/ Skills & Performance Manager
Availability of Match Funding (Income) for the J2W Operation	H	L	<p>NCC Officers are liaising closely with Joint Beneficiary partners to highlight available clean and eligible match funding sources.</p> <p>A legally binding Relationship Agreement will be signed by each Joint Beneficiary before delivery starts placing responsibility upon them to provide match funding their and to provide a contribution to the NCC Central Lead Team costs.</p>	Work/ Skills & Performance Manager
Further austerity actions leading to reduced budgets and Match Funding for the J2W Operation	M	M	<p>NCC and all Joint Beneficiaries have highlighted eligible sources of Match Funding; these sources are confirmed by NCC as the Lead and WEFO.</p> <p>WEFO are content to approve the Business</p>	Community Regeneration Manager

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
			Plan with assumptions made regarding Match Funding for years 2 and 3 of the Operation. Should the Match Funding change, there will be an opportunity to re-profile the operation accordingly.	
Required resources available to deliver approved J2W targets	H	L	Communication with Senior Management teams within the Joint Beneficiary partners to ensure the profile of Operation is raised and the appropriate resources are provided for effective delivery.	Work/ Skills & Performance Manager
Duplication of J2W Operation with other ESF Operations and employability programmes	L	L	Consultation with WG and ongoing communication with approved and proposed ESF Operations to ensure delivery is not duplicated within the South East Wales Region.	Work/ Skills & Performance Manager
J2W outcomes and indicators not being achieved	H	L	Regular Health Checks and meetings with Joint Beneficiaries and WEFO to monitor performance against approved targets, ensuring any issues effecting performance are resolved in a timely manner. J2W outcomes have been set at realistic levels based on regional data and partner experience with the targeted cohort of individuals.	Work/ Skills & Performance Manager
Non-compliance with WEFO requirements resulting in claw back of ESF Grant	H	L	Creation of robust performance and operational management procedures with regular reports to CM and strategic groups and	Work/ Skills & Performance Manager

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
			production of Legal contracts. Effective verification measures and audit processes completed by WEFO ensuring likelihood of ineligible expenditure or non-compliance is reduced.	
Joint Beneficiaries not providing relevant evidence to verify expenditure and outcomes	H	L	Implementation of strong legal agreements with all Joint Beneficiaries and completion of regular Health Checks to verify evidence.	Work/ Skills & Performance Manager
Lack of communication regarding approvals and updates for the authority	H	L	Regular updates provided to Senior Management and the Cabinet Member on the Operational performance and any changes in governance, finances, etc.	Community Regeneration Manager
Lack of communication with Joint Beneficiaries and adherence to the approved J2W Business Plan	H	L	Regular Health Checks and regional meetings with Joint Beneficiaries and WEFO to monitor performance against approved targets, ensuring any issues effecting performance are resolved in a timely manner.	Work/ Skills & Performance Manager
Reduction in the contribution to the NCC Central Lead Team due to a variance in Joint Beneficiary expenditure compared to the approved profile	M	L	Robust Relationship Agreement signed by each individual Joint Beneficiary, allowing the Lead Beneficiary to withhold the necessary ESF Grant to cover the Central Lead Team costs.	Work/ Skills & Performance Manager
Delay in receipt of ESF Grant by WEFO and payment to Joint Beneficiaries due to extended MVT claim verification process	L	L	Robust Relationship Agreement signed by each individual Joint Beneficiary, allowing for delay in receipt of ESF Grant and regular communication with WEFO to ensure the	Work/ Skills & Performance Manager

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
			claim verification process is completed prior to the next claim submission.	

Links to Council Policies and Priorities

The proposed ESF Operation will aim to provide interventions that address the Well-being objectives adopted by Newport City Council from the Wellbeing of Future Generations Act and will seek to maximise the contribution to the achievement of the seven Well-being Goals for Wales by;

- Improving the skills, educational outcomes and employment opportunities (Objective 1)
- Promoting economic growth and regeneration whilst protecting the environment (Objective 2)
- Enabling people to be healthy, independent and resilient (Objective 3)
- Building cohesive and sustainable communities (Objective 4)

The Journey 2 Work Operation will link to the above four Well-being Objectives through the below activity;

- Objective 1 – Support participants engaged to improve basic skill levels and increase personal capacity to assist them into sustained employment, training or education.
- Objective 2 – Prevent increased unemployment of the participants engaged which may reduce an individual's quality of life.
- Objective 3 – Improve the participants mental well-being through participation in activities such as employment support, work placements and training.
- Objective 4 – Ensure engagement activities for participants are delivered in communities across all of Newport, increasing the involvement of hard to reach groups.

Options Available and Considered

Commence delivery of the Journey 2 Work Operation when formal approval is received from the Welsh European Funding Office.

This option will provide Newport City Council with additional resources from the European Social Fund to identify and support unemployed and economically inactive individuals aged 25 years and over at risk of poverty across the South East Wales region.

To not commence delivery of the Journey 2 Work Operation.

Newport City Council will not access the available ESF Grant to increase resources and deliver interventions to unemployed and economically inactive individuals aged 25 years and over at risk of poverty.

Preferred Option and Why

Option 6.1 is the preferred option as this will allow us to shape the delivery of projects to meet Newport City Councils corporate objectives as set out under the One Newport plan.

Journey 2 Work will create further resources funded externally from the European Social Fund ensuring people of all ages, living in both Communities First and non-Communities First areas, have access and opportunity to gain the appropriate skills, knowledge and qualities to secure lifelong employment.

With Newport City Council as the Lead Beneficiary of the Operation for the South East Wales region we can ensure that Newport receives an ESF Grant of approximately £0.5 million for regional management and local delivery, over 3 year period, to further support the Skills and Work agenda.

Comments of Chief Financial Officer

Journey to Work received Cabinet Member approval in October 2015 to commence operation and is financed via the European Social Fund. The proposal to act as Lead Beneficiary will result in a need to create additional resource in the Central Team responsible for submitting expenditure and outcomes achieved by the Joint Beneficiaries but the cost of this will be recovered from the ESF Grant and contributions made by the Joint Beneficiaries.

Through the application of a robust legal agreement NCC as the Lead Beneficiary can ensure that if any of the funding streams are reduced or ceased entirely then Joint Beneficiaries are required to reduce expenditure and scale back operations accordingly.

Comments of Monitoring Officer

The proposed Journey 2 work scheme is in accordance with the Council's social and economic well-being powers under section 2 of the Local Government Act 2000 and meets the Council's well-being objectives under the Future Generations Act and the Corporate Plan objectives. The Cabinet Member has previously agreed to the Council acting as Lead Beneficiary in applying for ESF grant in relation to this scheme and WEFO funding approval has now been received. Therefore, the Cabinet member is now required to approve the implementation of the scheme upon the terms previously agreed. A Relationship Agreement will be required, on the same terms as the previous Inspire 2 Achieve and Inspire 2 Work Schemes, to ensure that the other partners fully indemnify the Council, as the Lead Beneficiary, in relation to their match-funding and other grant obligations. This joint Relationship Agreement will, again, have to contain flexibility to scale back the level of operation in the event that the match funding cannot be secured for years 2 and 3. Because the Council will be the employer of the Central Lead Team and the additional Journey 2 work staff, then there may be redundancy implications when the funding is discontinued, and provision will need to be made for these costs as part of the business case and the joint agreement with the other partners. TUPE is unlikely to apply, even if any of this work is current being undertaken by Housing association staff, because there is no service provision change, as such, involving the Council as commissioner of the services. However, staff could be redeployed into the new posts by voluntary agreement.

Comments of Head of People and Business Change

The Journey 2 Work operation aims to provide a comprehensive package of support to those aged 25 and over who are furthest from the labour market. It aims to target those who are economically inactive and long term unemployed, not in education or training and who have complex barriers to employment. The programme follows on from the Inspire 2 Achieve and Inspire 2 Work operations that have previously been approved by the Council. NEET levels, youth unemployment and low skills are well established priorities for the Council and their partners and are connected to a range of poor long-term outcomes including mental health, offending, long term unemployment and family wellbeing. This programme adopts an integrated approach, focuses on prevention, and involves young people. It fully supports the sustainable development principles and the five ways of working as set out in the Wellbeing of Future Generations Act.

The newly created posts will be hosted by Newport City Homes and as such any recruitment decisions will rest with that organisation. Should there be any Newport City Council employees who either carry out a significant proportion of this work already, or who are at risk of redundancy from carrying out this type of work, the Council will seek to engage with Newport City Homes to consider redeployment or whether entitlement to TUPE applies.

Comments of Cabinet Member

Cabinet Member has approved the report.

Comments of Non-Executive Members

Councillor P Hourahine:

I of course full support this initiative to assist this oft overlooked section of our community. As it is only a two and a half year project, I trust Officers will continue to seek future funding for this area of support for these vulnerable people.

Response from Cabinet Member for Education & Skills:

The previously approved Inspire 2 Achieve and Inspire 2 Work ESF operations have both received approval from WEFO to extend delivery until December 2022. It is our intention to seek an extension of 26 months for the Journey 2 Work operation to deliver until December 2022. The Central Lead Team will submit an application to WEFO for the extension in December 2018 with a view to approval and receipt of the Grant Offer Letter prior to March 2019.

Scrutiny Committees

N/A

Equalities Impact Assessment and the Equalities Act 2010

The Equality Act 2010 contains a Public Sector Equality Duty which came into force on 06 April 2011. The Act identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The newly created single duty aims to integrate consideration of equality and good relations into the regular business of public authorities. Compliance with the duty is a legal obligation and is intended to result in better informed decision-making and policy development and services that are more effective for users. In exercising its functions, the Council must have due regard to the need to: eliminate unlawful discrimination, harassment, victimisation and other conduct that is prohibited by the Act; advance equality of opportunity between persons who share a protected characteristic and those who do not; and foster good relations between persons who share a protected characteristic and those who do not. The Act is not overly prescriptive about the approach a public authority should take to ensure due regard, although it does set out that due regard to advancing equality involves: removing or minimising disadvantages suffered by people due to their protected characteristics; taking steps to meet the needs of people from protected groups where these differ from the need of other people; and encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

Children and Families (Wales) Measure

Although no targeted consultation takes place specifically aimed at children and young people, consultation on planning applications and appeals is open to all of our citizens regardless of their age. Depending on the scale of the proposed development, applications are publicised via letters to neighbouring occupiers, site notices, press notices and/or social media. People replying to consultations are not required to provide their age or any other personal data, and therefore this data is not held or recorded in any way, and responses are not separated out by age.

Wellbeing of Future Generations (Wales) Act 2015

The "Sustainable Development Principle" – 5 Ways of Working within the Wellbeing of Future Generations (Wales) Act 2015 have been considered through the Journey 2 Work operation. The below demonstrates how the operation has considered and addressed those 5 principles:

- Long term: The Operation will aim to provide long term sustainable employment but will also ensure that short term needs are met without compromising the ability of future generations to meet their own needs. Consideration will be given to the seven well-being goals within the Wellbeing Act when delivering activity.
- Prevention: The Operation will engage with those furthest away from the labour market that are unemployed to provide support that will reduce the risk of poverty. It will address skills requirements that will prevent potential skills shortages in the future that could inhibit economic growth.

- Integration: The Operation will ensure that delivery will align and impact on our wellbeing objectives, our wellbeing goals, other objectives and those of other public bodies.
- Collaboration: The Operation has completed extensive consultation as noted in point 17 below to ensure it has considered how acting in collaboration with any other person or any other part of our organisation could help meet our wellbeing objectives.
- Involvement: The Operation has considered the importance of involving people with an interest in achieving the wellbeing goals with continual consultation and evaluation planned, ensuring that those people reflect the diversity of the City we serve.

Crime and Disorder Act 1998

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.

Consultation

The Journey 2 Work Operation has been developed by partners across 10 local authorities and in consultation with the newly formed ESF sub group that was created through the Economic Regeneration theme of the Cardiff City Region Deal. The activity of Journey to Work will be reported to the Cardiff City Regional Board as well as the regional skills board. The Learning, Skills and Innovation Partnership (LSkip) 2016 Regional Employment and Skills Plan notes the below with regard to skills support across the sectors:

- Soft Skills – collaboration; communication; leadership and management.
- 21st century apprenticeship frameworks.
- Higher-level apprenticeships and degree apprenticeships.
- Welsh Government, e.g. Code of Practice; Ethical Supply Chains.
- Developing local supply chains – industry cluster engagement.
- Upskilling managers' digital capability and leadership skills.
- Improving skills to move productivity levels from good to excellent.
- Management skills to improve skills utilisation
- Strategic, holistic approach to engage with hard to reach across the region.

The Operation has been designed to work in conjunction with other programmes and Welsh Government back bone projects and will not duplicate but compliment and add value, filling gaps in provision where there is a specific need. This includes alignment with other ESF Operations such as:

Communities 4 Work – The Operation will predominantly work outside Communities First and Communities 4 Work areas, focussing our activity on areas and participants that would not have the benefit of these programmes. Referrals will be gained from C4W for those individuals seeking support but living outside of a Communities First area.

SOVA Achieving Change through Employment (ACE) – The Operation has engaged with SOVA to discuss their East Wales operation, and have identified potential opportunities for them to refer individuals not eligible for their operation onto Journey 2 Work.

Upskilling@Work – The Operation has engaged with Coleg Gwent who is the Lead Beneficiary for this operation, to consider how it may provide additional support for participants exiting the Journey 2 Work operation. The Upskilling@Work Operation aims to increase the skills level, including work relevant skills of those in the workforce with no or low skills.

Parents, Childcare and Employment (PaCE) – The Operation has engaged with the PaCE project to ensure where childcare is highlighted as a main barrier to employment a referral will be made from J2W for support.

Journey 2 Work has engaged in detailed discussion with partners, as below:

- Newport City Council has engaged specifically with Migration Officers to discuss concerns around engaging the Roma population in training and employment opportunities.
- Lead Officers have attended events held by the South East Wales Regional Learning Partnership (LSkip), and the Lead Beneficiary sits on both P1 and P3 ESF Support Groups. Journey 2 Work has engaged in the P1 Support Group along with other operational partners across the South East Region to enable further collaboration. The Support Groups enable the operation to engage with other local, regional, and national Operations (in development and delivery stages) that deliver in South East Wales to ensure complementarity, and to avoid duplication.
- The Operation has considered Priority Axis 2 operations and the support for participants who are exiting the J2W Operation into employment but may require further training and qualifications to sustain employment.
- Local Authority partners have engaged with Communities First within their areas to discuss the Communities 4 Work Operation that is specifically targeted to 25 plus year olds and how it can work in partnership with Journey 2 Work.
- The proposal has been designed to work in conjunction with other programmes and Welsh Government back bone projects and will not duplicate but compliment and add value, filling gaps in provision where there is a specific need.
- As part of delivery, Joint Beneficiaries will be engaging with Jobcentre Plus to investigate numbers of unemployed and economically inactive individuals within the South East Wales region and referral pathways.
- Lead Officers have attended the PSB workshop to discuss the Economic Well-being theme within the Well-being of Future Generations (Wales) Act 2015 and engaged with stakeholders present regarding the support that can be provided by the Operation.

The following partners have been consulted during the development of the Journey 2 Work Operation, with their level of involvement noted in the below table:

Organisation	Involvement
Newport City Council	Lead beneficiary & Joint Beneficiary
City of Cardiff Council	Joint Beneficiary
Monmouthshire Housing Association	Joint Beneficiary
Vale of Glamorgan Council	Proposed delivery partner
Monmouthshire Council	Proposed delivery partner
Coleg Gwent	Interested in procured or referral opportunities
Cardiff and Vale College	Interested in procured or referral opportunities
Blaenau Gwent CBC	Member of SWYP group Lead Beneficiary: WWV Inspire Operations
DFES	Member of SWYP group
DWP	Member of SWYP group
Public Health Wales	Member of SWYP group
South East Wales Regional Engagement Team	Member of SWYP group
Cardiff City Region Proofing Board	Endorsement of proposals
Learning, Skills & Innovation Partnership	Endorsement of proposals
Careers Wales	Consulted on proposals
Communities First	Consulted on proposals
Families First	Consulted on proposals
Melin Homes	Consulted on proposals
Llamau	Consulted on proposals
Pobl	Consulted on proposals
Newport City Homes	Consulted on proposals

In addition, the following engagement and consultation activity has contributed to the development of the operation:

Local Authority partners

- Regular scheduled meetings and communication with key individuals
- Attendance and participation in regional meetings for Skills, Worklessness and Young People (SWYP)
- Participation at regional monthly meetings of the East Wales ESF working group
- Discussion at regional project management/ development meetings
- Newport City Councils Young People Education, Employment and Training forum
- Vale of Glamorgan CYP Programme Board
- Monmouthshire Business Employment Skills and Training (BEST) Partnership
- Newport City Council Work Based Learning Academy Coordinator to ensure provision of work opportunities
- Newport City Council Local Service Board – Work Based Learning Academy
- Newport City Council Policy, Partnership and Involvement, link to Economic Well-being through the Well-being of Future Generations (Wales) Act 2015

Non LA partners

- All four Local Authority Local Service Boards
- Attendance and participation in regional meetings for Skills, Worklessness and Young People
- Coleg Gwent
- Cardiff and Vale College

Background Papers

Please see below as appendices the Journey 2 Work business plan and Equality Impact Assessment.



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Dated: 18 May 2018



Equality Impact Assessment Form (updated March 2016)

This is where you evidence how a policy or practice, or a decision relating to a policy or practice, complies with the general equality duty to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations

This form is intended to guide and prompt you about the questions and evidence that you need to think about. As indicated in the guidance, this assessment takes into consideration each of the “protected characteristics” listed in the Equality Act 2010 – race, age, gender etc. This assessment should be used to inform any relevant decision about the policy or practice. Please state policy options in the assessment.

Service Area: Regeneration, Investment & Housing	Head of Service: Beverly Owen	Person responsible for the assessment: David Price	Date of Assessment March 2016	
Name of the policy/practice to be assessed: Work & Skills programmes			Is this a new, existing or policy/practice under review?	Existing

<p>1. Briefly describe the purpose of the policy/practice</p> <p>If the policy/practice is under review, please list any options under consideration</p>	<p>The Community Regeneration department delivers a number of employment and training Measures, which include supported employment, training, Work Clubs, Work Experience, Skill Development, and Enterprise Initiatives. Our aim is to create a framework in which Advisers can focus on delivering results, activity and processes, and have a wide range of partners to draw support for customers. This framework will allow a more accessible, effective and personalised programme of support to be delivered to our customers. Our framework will include:</p> <ul style="list-style-type: none"> • A minimum policy requirement, including face-to-face meetings; • Flexible adviser support delivered by advisers according to need. • A flexible menu of support options. <p>These points will assist the team to deliver and;</p> <ol style="list-style-type: none"> 1. Engage people into mainstream provisions and employment related activities. 2. Improve people skills and educational achievement with relation to employment and further education. 3. Support people into employment.
<p>2. Name any associated policy, legislation, corporate objective etc.</p>	<p>DWP - Welfare to work Reform Worklessness and Skills agenda Community Strategy Communities First strategy Youth Engagement and Progression Framework</p>
<p>3. Who are the main stakeholders in relation to the policy/practice?</p>	<ul style="list-style-type: none"> • Newport City Council – Deliver services, employ all staff who deliver services and coordinate activities with partners. • DWP/ JCP – Provide referrals and benefit guidance for customers and workers delivering the service. • Communities First Partnerships – Supporting the service by providing recourses such as venues, volunteers and support staff. • Local Service Board • ESF (WEFO) • The people taking part in the programmes delivered • Employers and business in Newport that benefit from a better skilled workforce

<p>4. Who performs the service?</p>	<p>Newport City Council provides this service through their Community Regeneration Team. (Work & Skills, Youth Service, Communities First, Families First, Flying Start, Play Development)</p> <p>Working in partnership with the stakeholder partners to create an environment of delivery that is well resourced, financed and professionally delivered.</p>
<p>5. What outcomes are wanted from this policy/practice?</p>	<p>Create an engagement tool that delivers effective communication, Accessibility, Capability and effective processes.</p> <ul style="list-style-type: none"> • Engage people into mainstream provisions and employment related activities. • Support people to remove barriers to employment such as child care, accommodation, budgeting etc. • Improve people skills and educational achievement with relation to employment and further education. • Support people into work experience placements. • Support people into employment. • Inform strategic reports with statistical results achieved to support Outcome agreements and Business Unit Plans.
<p>6. What factors could contribute to/detract from the outcomes (risks/opportunities)?</p> <p>Please list the factors for each separate policy/process option under consideration</p>	<p>Risks</p> <ul style="list-style-type: none"> • Reduced income will affect the level of resources. • Changes in legislation and welfare reform will affect customer circumstances. • Further dip in the economy would detract against those looking for employment. <p>Opportunities</p> <ul style="list-style-type: none"> • Changes in welfare reform could push people back to employment or into activities. • Continued good performance will create further income to invest in further resources
<p>7. Describe the steps you have taken to carry out this assessment e.g. consultation and involvement</p>	<p>We have take a 4 step approach to the assessment and considered feedback;</p> <ol style="list-style-type: none"> 1. Partners and Stakeholders 2. Staff 3. Community members (customers) 4. Employers <p>We have completed consultation events with all 4 groups. For stakeholders and staff we have completed meeting where we have asked a series of questions and created discussion groups to collate the information.</p> <p>We completed consultation with customers by completing surveys one to one.</p>

8. Give a summary of the information the council has taken into account for this assessment

Community Surveys – We have completed a survey across our communities First areas asking a series of questions that provided us with peoples perceptions of employment, skills and education in the city, from this we are able to target specific projects and programmes that will directly deliver community needs.

Consultation events – We have completed consultation events with employers and partners. At which a series of points were discussed and all information was collated again informing the projects that we put in place.

9. Does the policy /practice eliminate discrimination and promote equality and good community relations due to:

- **Age**
- **Gender**
- **Disability**
- **Race**
- **Religion/belief**
- **Welsh language**
- **Gender reassignment**
- **Marriage/civil partnership**
- **Sexual orientation**

All support consciously provides specific support based upon each persons Age, Gender, Disability, Race, Language, and Gender. We will provide specific support based on specific needs.

All people will be entitled to access the Work Based Learning Academy programme that support work placements and employment opportunities.

Age – Delivering services to people aged 16 – 70. This age range has been delivered in line with DWP welfare legislation and DWP guidance for working age. Using this guidance we do target project specifically 16 – 19 year olds and 18 – 24 year olds through specific projects.

Gender – Working inclusively to deliver all services to all gender groups. We monitor the ratio of delivery to this group and will actively promote.

Customers will be referred to the team irrespective of gender; we expect our delivery to benefit all customers in finding employment and improving skills. The team will issue guidance to advisers on referrals, ensuring that all referrals are made on the basis of suitability for the provision.

Women are more likely to have caring and childcare responsibilities than men. To mitigate any potential impact, we will provide support to all carers and those with childcare responsibilities to help them to improve skills, look for and sustain work. Our teams will also be signposting parents to more specialist services, where necessary. We will make parents aware of local provision of services of which they might not previously been aware.

Disability - We will ensure that our provision is accessible to disabled claimants. For example, by continuing to train and provide supervision to advisors so they are able to work flexibly with claimants with hidden and complex needs; and producing materials in accessible formats. Where appropriate, advisers will proactively consider whether reasonable adjustments might benefit claimants with disabilities. Referrals to appropriate partners will continue to take place for claimants facing complex barriers to employment, with the highest support needs. For example the introduction of ESA and activities to support this customer group will see more customers entering employment.

Sexual Orientation - All customers will be treated fairly and equally regardless of sexual orientation. Greater flexibility will allow advisers to focus on and take account of the employment support needs of individual customers.

Religious Belief - All claimants engaged into activity will be treated fairly irrespective of their religion or belief and will not be asked to undertake any activity which goes against their belief and allowances will be made to reflect religious holidays and practice.

All projects are accessible 9 – 5 Monday to Friday every week ensuring that services are available to all customers.

Race – Customers will be engaged regardless of race, Language poses a barrier to employment for some claimants from ethnic minorities. Claimants will be offered fully funded English for Speakers of Other Languages (ESOL) provision. Additionally the promotion of projects will take into consideration customer's race. We are expecting to see a greater impact on services with relation to language especially with Newport being a Hub for immigration in Wales. We are preparing further resource to support ESOL and basic skills.

Welsh language – All information relating to our projects are available in Welsh also dialogue with adviser is also available in Welsh if requested.

Gender reassignment – There is no impact on this group

Marriage/civil partnership – There is no impact on this group

Accessibility - Considerations - Is there any mobility issues that may affect the client's ability to access the support offered? Are there caring issues that need to be taken into account to allow the client to attend?

Mitigation - Discussion initiated with the customer at outset to understand any equality issues to be taken into account. Support arrangements agreed with customer to facilitate access to intervention/support. Time is allocated based on agreed individual requirements of customers.

Communication - Consideration – Translation requirements, Learning disabilities, Mental health, Other health considerations.

Mitigation - Focuses initially on individual need, mapping out extra support or reasonable adjustment requirement.

Ensure appropriate method of contact is in place to provide most appropriate level of service. External support options are considered based on client need.

Capability - Consideration - Are there knowledge and capability gaps that will prevent advisers applying processes appropriately? Mitigation - Discussion initiated with the customer at outset to understand any equality issues taken into account. Support arrangements agreed with client to facilitate activities. Discussion with customer focuses initially on individual need, mapping out extra support or reasonable adjustment requirement. Ensure appropriate method of contact is in place to provide most appropriate level of service. Advisers are regularly assessed via the Quality Assessment Framework and Performance Management Framework and personal development targeted as required.

10. Summary of the impact of the policy/practice on the general equality duty

The implementation of this policy will assist the local authority to eliminate unlawful discrimination by ensuring that all staff familiarise themselves with the policy. The implementation will ensure that the authority mitigates any possibility of discrimination. Also if the authority is challenged, the policy will provide evidence of a process that is followed within the organisation to eradicate any form of discrimination.

The policy will also actively improve the quality of the offer of opportunities that we offer to local residents. Ensuring that the local residents are adequately informed and regardless of circumstance.

The policy will finally provide a consistent message across all groups of people ensuring that the information is relevant and informative.

Equality Action Plan –		
Key Actions	Actions (with dates) Any associated performance measures	Lead Officer(s)
Further actions to eliminate discrimination, promote equality and good community relations on the grounds of:-		
Age Gender Etc	<p>When determining the level of support a customer requires, have processes been assessed to ensure they meet legislative requirements? Due regard is given to all methods of managing interventions with clients to ensure fairness and parity.</p> <p>We measure the success of contact with customer groups by counting the number of customers that we engage with, measure the number of people employed against those we have engaged with.</p> <p>We will also measure our success against National performance and local performance as provided by the Department of Work and Pensions.</p> <p>Every customer that engages into activities completes an equality survey that will ascertain their age, gender, Race, Religion, and disability to ensure that we are prepared to provide an accessible service to the customer.</p> <p>As highlighted in section 9 we have a concern with regards to specific groups and plan to put in place the following interventions.</p> <p>Disability – We ensure that all venues are DDA compliant and that customers are able to communicate in any format they require. We have also invested in training for staff to ensure they are equipped to provide support for both mental and physical disabilities.</p> <p>Language – We have ensured that we have suitable provision available to support customers through both translation and the learning of English as a second language. We work closely with the BME partnerships in Newport to provide translation solutions and work closely with local colleges to provide suitable ESOL provision.</p> <p>All inductions and greetings are conducted in the medium of Welsh, and the opportunity is provided to all residents to continue their activities in the medium of Welsh.</p>	David Price
If there are decisions pending that will affect this policy/practice please state when and how the decision will be taken	NA	

<p>How will the policy/practice be:</p> <ul style="list-style-type: none"> • Monitored • Performance assessed • reported 	<p>We will monitor performance based on a single number count of customers who engage into services and are affected by the service, i.e. training, education and employment.</p> <p>We will assess performance against a number of Key Performance Indicators that are used in performance monitoring.</p> <p>We will report performance using the Business Unit Plan, and the LDA performance indicators.</p>	
<p>Does the EIA need to be revisited in 6 months/a year?</p>	<p>Annually</p>	

Signed (lead officer) _____

Signed (Head of Service) _____

Date _____