

Appendix Two – Equalities Impact Assessment

Equality Impact Assessment Report	
Date	7 July 2016
Sign-off path for EIA	Corporate EIA Panel
Title of Project, business area, policy/strategy	Employment and Skills Section 106 Supplementary Planning Document
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London Borough of Lambeth

Full Equality Impact Assessment Report

1.0 Introduction

1.1 Business activity aims and intentions
In brief explain the aims of your proposal/project /service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the political vision, and outcomes?

The council has produced a draft Supplementary Planning Document (SPD) to set out the Section 106 planning obligations relating to employment and skills that we will seek from major developments in the borough.

There is already an SPD in place which was agreed in April 2012, and additionally a draft SPD published for consultation in July 2013.

This new draft document updates the obligations we are seeking given the changes in the labour market and the adoption of the Lambeth Local Plan.

The draft SPD seeks a mixture of financial and in-kind contributions from developers. This includes commitments to apprenticeships, supported employment opportunities for long-term unemployed residents and links with schools/colleges. Additionally a financial contribution to employment and training activities will be sought. The draft SPD seeks a greater emphasis on end-use job opportunities (i.e. in the shops, offices, hotels once they are open) rather than during the construction phase as is currently the case.

Cabinet members are being asked to approve this draft SPD is put out to public consultation. This would be for an eight week period from December 2016 to February 2017. The feedback from the consultation would be analysed and the Council's response will be published.

2.0 Analysing your equalities evidence

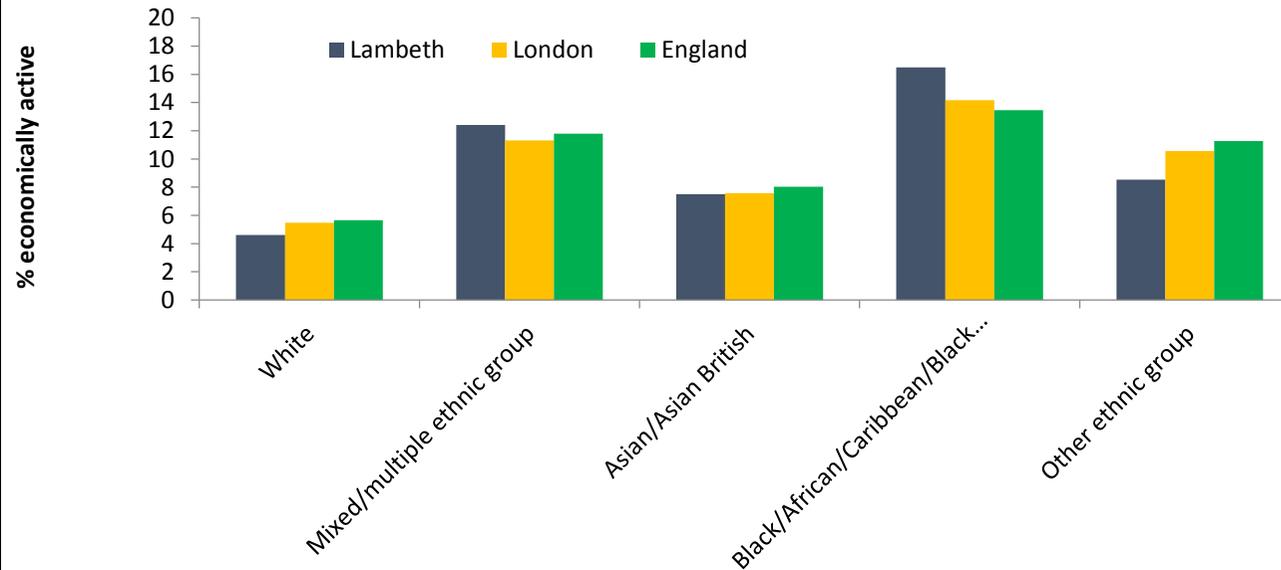
2.1 Evidence

Protected characteristics and local equality characteristics

Impact analysis
For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and:

Race	<p>Positive</p> <p>The differences in employment rates for areas within Lambeth are closely linked with the ethnic profile of these areas. Overall, employment rates are significantly higher for white Lambeth residents than for those from Black and Minority Ethnic (BME) backgrounds. In the year to December 2015 84.4% of white working age residents were in employment compared to 66.2% of BME working age residents.</p> <p>In the 12 months ending December 2015 there were around 4,900 people from BME groups that were unemployed in Lambeth. At 9.2% of economically active BME residents, the rate of unemployment was significantly higher than the Lambeth (6.2%) average for this period, as it has been over the last decade. However the BME unemployment rate in Lambeth is similar to the London (9.2%) and national (9.5%) averages. Due to the sample sizes it is not possible to get a more detailed analysis of unemployment by more specific ethnic groups.</p> <p>A more detailed analysis is available using the 2011 Census, although this data will now be four years out of date. As the chart below shows, the Census shows that unemployment varies significantly among Lambeth residents from different ethnic backgrounds. The unemployment rate is particularly high among Lambeth residents from a Black background. Excluding full-time students, 16.5% of economically active Black residents were unemployed in 2011, above the London (14.2%) and England (13.5%) averages for this group and almost four times higher than the unemployment rate for white residents in Lambeth (4.6% in 2011). Unemployment among residents from mixed ethnic backgrounds was also relatively high, while unemployment was lower than the London and England averages for white residents, as well residents from an Asian background or other ethnic groups.</p>
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Figure 1: Unemployment by ethnic background (% economically active aged 16+) (excluding FT students)



Source: Census, 2011

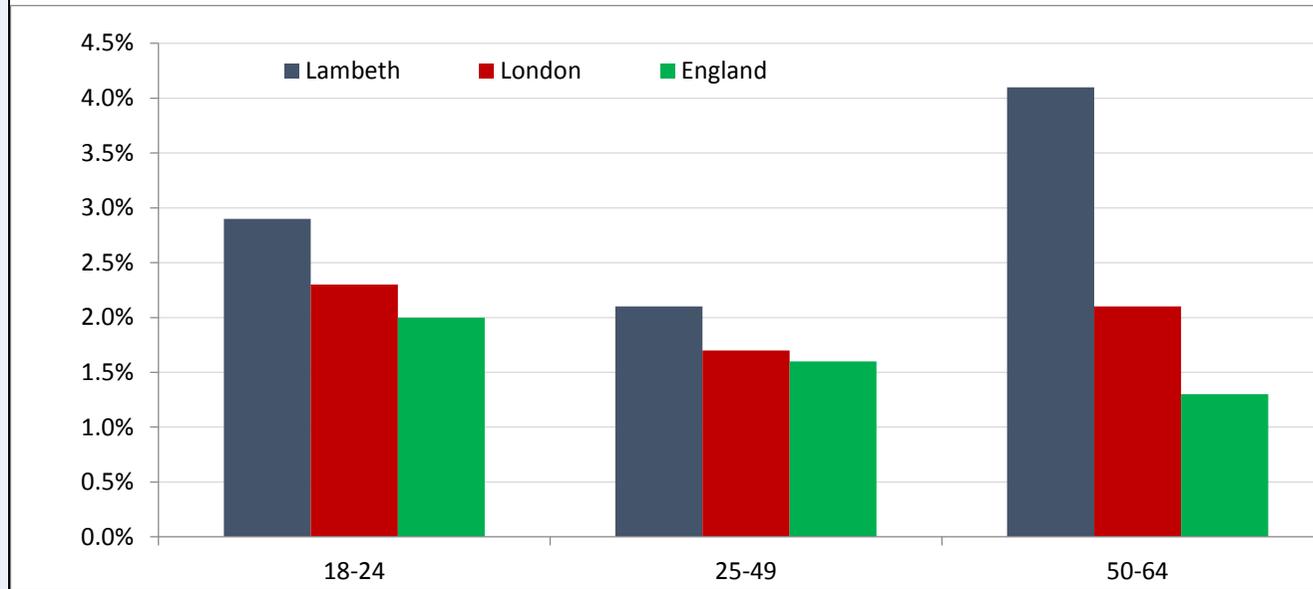
The draft SPD will provide resources to enable us to take forward our priority of providing more personalised employment-related support to those furthest from the labour market. It will also help to focus resources on a wider range of end user jobs as well as construction jobs for direct resident access.

We have tried targeted activities based on residents' ethnicity, such as the Young Black Males employment project, with mixed success. Unemployment seems to be more closely related to tenure (social housing) and low skills levels, with Black residents featuring in both these categories. Therefore our efforts to provide more effective links between employment providers and social housing registered providers, and to make more vocational courses available (which match the demand for skills from employers) should contribute to a reduction in unemployment for Black and Mixed ethnicity residents.

	<p>Our Residents' Survey suggests that Black Caribbean and Mixed ethnicity residents are more likely to feel their financial circumstances have got worse over the last 12 months compared to other ethnic groups (35% and 32% respectively, compared to 20% for all residents). This suggests that these residents are not currently feeling the benefits of economic growth.</p> <p>"Future Lambeth: Our borough plan" identifies the need to reduce inequalities between communities and residents in different circumstances, and the draft SPD would help to release resources associated with development to enable us to do this.</p> <p>However, we must ensure that the impact of individual interventions does indeed achieve the impact we are intending on ethnic minority employment, through careful monitoring of outcomes.</p>
Gender	<p>Positive</p> <p>The employment rate for both men and women in Lambeth has increased considerably over the last four years. Lambeth already has the highest employment rate for females in London (74.6% compared to 66.5% for London) although female employment is still lower than male employment. Similarly females in Lambeth are slightly more likely to be unemployed than males with unemployment rates at 7.2% and 7.0% respectively (June 2015).</p> <p>The draft SPD will enable the council to increase emphasis on end-use jobs which can provide a wider range of opportunities than the previous approach which made far more of construction phase jobs. This should benefit men and women in the borough, and in particular women who constitute a minority of the workforce on construction sites.</p>
Gender re-assignment	<p>Positive</p> <p>The report "A Trans Agenda" produced by ESRO for Lambeth Council in January 2012 highlighted the discrimination that Trans people can face in accessing employment. It quotes figures from the London LGBT Matters report stating that "17% of trans respondents reported having experienced discrimination in the context of skills, training and job."</p> <p>The report goes on to say "To say that discrimination prevents trans people from succeeding in the world of work is an unjust simplification. Discrimination may well be widespread. Further, respondents spoken to in this study demonstrate that the mental health complications which some or many trans people experience also partly explain the underemployment suffered by some trans folk. "</p> <p>The programmes supported by S106 agreements as a result of implementing the draft SPD will include activities undertaken by Lambeth Working. Our priority to provide more personalised employment-related support for unemployed people with more complex</p>

	<p>needs will include providing better links between employment and mental health services, directly contributing to the issues highlighted in the report. Also the principle of a person-centred approach will ensure that support is adapted to individuals' circumstances, which could include issues relating to gender re-assignment.</p>
Disability	<p>Positive</p> <p>The employment rate for working age residents with a disability is 51.2% (ONS Annual Population Survey, December 2015). This is lower than the employment rate for residents without a disability (83.6%) although higher than the comparable rate for London (50.1%). Females with a disability are less likely to be in employment than males with a disability (43.7% compared to 58.1%).</p> <p>The SPD will help the Council to support the priority groups identified in the Investment and Opportunity Strategy which includes unemployed people with complex needs. This includes residents on health-related unemployment benefits (i.e. Employment Support Allowance and Incapacity Benefit) and we have now introduced two programmes specifically to support these residents. S106 resources will help to identify employment opportunities for those people who have been unemployed for some time and who need additional support within the working environment.</p> <p>With the move to more personalised employment-related support we would expect to see residents with a disability who are unemployed and seeking work to be provided with more relevant help to find employment.</p>
Age	<p>Positive</p> <p>Employment rates for 16-24 and 25-49 year olds are significantly higher in Lambeth than elsewhere in London (62.0% compared to 46.0% and 86.9% compared to 80.3% respectively), according to the Annual Population Survey (June 2015). The employment rate for over 50s is marginally higher than London average (70.3% compared to 69.6%). Figures for unemployment by age at a borough level are statistically unreliable from this source. However Job Seeker's Allowance claimant rates show Lambeth having a higher proportion of claimants for all age groups, especially amongst residents aged over 50.</p>

Figure 2: Claimant count rate by age group (%)



Source: JSA Claimant Count, October 2015

Lambeth has a high rate of long-term unemployment compared to London, and those aged 50-64 are disproportionately represented in this group (1.7% of all those aged 50-64 have been on JSA for more than 12 months, compared to 0.8% in London and 0.5% nationally).

The draft SPD sets a target for a minimum of 25% of the workforce to be local. Developers will also engage in bespoke pre-employment and skills training to support access to end-use as well as construction jobs, and identify opportunities to provide supported employment opportunities. The Council's priority is to support long-term unemployed, and as older people are disproportionately reflected in long-term unemployed, they should benefit to a greater extent from the interventions.

As the chart above shows, young people are also disadvantaged in the labour market. The draft SPD specifically highlights the need for developers to create apprenticeships, which would be for young people up to the age of 25. It also sets out the need for engagement

	<p>with young people aged 11 to 19 through local schools and colleges to promote the skills and qualifications needed for employment in the industrial sectors of the end-use occupiers of new developments. We will use this support to target young people through:</p> <ul style="list-style-type: none"> • Career inspiration – speakers, role models and work taster events; • Employability: mentoring and support • Curriculum support; • Work-based learning; and, • Enterprise: encouraging entrepreneurship amongst young people in schools. <p>This is based on feedback from young people through three focus groups carried out in February 2015, including one with Children in Care and Care Leavers.</p>
Sexual orientation	<p>Unknown</p> <p>There is currently no data published on sexual orientation and employment or business. In the absence of data or other specific evidence it is not possible to judge the specific impact on this protected characteristic.</p> <p>Nevertheless, the emphasis on increasing the availability of personalised and holistic employment support could have a positive impact on the group if barriers to employment were encountered that related to sexual orientation.</p>
Religion and belief	<p>Unknown</p> <p>There is currently no data or research published on the links between religion and belief and employment or business. No anecdotal evidence has been presented that there would be any impacts as a result of the strategy. In the absence of data or other specific evidence it is not possible to judge the specific impact on this protected characteristic.</p>
Pregnancy and maternity	<p>Unknown</p> <p>The Cumulative EIA discussed a number of issues relating to parental employment. For residents with children, the relatively limited range and type of job roles that would accommodate caring responsibilities (e.g. by fitting into school hours) impacts on their ability to obtain work. For residents with children, and particularly with larger families, the costs of childcare for both younger and school age children sometimes means that people are not financially better off in work. We know that the costs of childcare in central London can be prohibitively high, and that even under Universal Credit, the incentive for single parents to work will be weakened (IFS, 2016).</p>

	<p>The draft SPD will support discussions with developers around the identification of a range of more flexible and part-time opportunities that could be accessed by a wider range of residents, including those with children. This is also in line with the Council's accreditation as a Timewise employer. However in the absence of data or other specific evidence it is not possible to judge the specific impact on this protected characteristic.</p>
Marriage and civil partnership	<p>Unknown</p> <p>There is currently no data or research published on the links between marriage/civil partnership and employment or business. No anecdotal evidence has been presented that there would be any impacts as a result of the implementation of the draft SPD. In the absence of data or other specific evidence it is not possible to judge the specific impact on this protected characteristic.</p>
Socio-economic factors	<p>Positive</p> <p>The challenge set out in "Future Lambeth: Our borough plan" is to shape the investment and development taking place in the borough to ensure it leads to lasting change for all parts of the local economy and communities. The Cumulative EIA identified priority groups as:</p> <ul style="list-style-type: none"> • Households with children and young people living in poverty; • Residents in low paid employment; • Long-term unemployed residents; and • Residents with complex support needs and their carers. <p>Many of the residents in all of these categories are those that the draft SPD is designed to enable the Council and developers to support. Through supporting residents with more complex needs and suffering from long-term unemployment into jobs, the Council is targeting its employment and skills programmes increasingly to tackle the inequality facing communities in the borough.</p>
Language	<p>Unknown</p> <p>We have not been able to identify any data on the links between language and employment or business. There is anecdotal evidence that suggests that a lack of English is a barrier preventing some residents from progressing in work.</p> <p>We are working with the College and through our Adult Community Learning programmes to support these residents through ESOL provision within our employment support and vocational training programmes. We are also seeking to extend ESOL provision through a cross-London project funded from the European Social Fund.</p>

	<p>However, in the absence of data or other specific evidence it is not possible to judge the specific impact on this protected characteristic.</p>
<p>Health</p>	<p>Positive</p> <p>Employment and Support Allowance (ESA) is the benefit specifically aimed at those who are unable to work due to incapacity, along with the incapacity-related benefits (IB) which ESA superseded upon its introduction in October 2008, but which are still payable to people whose claims began before this date.</p> <p>In May 2014 the DWP Claimant Count shows there were 12,960 people of working age in Lambeth claiming an incapacity-related benefit, accounting for around half (49.3%) of all key out-of-work benefit claimants in Lambeth. At 5.5% of the population aged 16-64, the rate of ESA/IB claimants in Lambeth was above the London average (5.2%) but below that for England as a whole (6.2%). 48.8% of Lambeth claimants have mental/behavioural disorders as their primary condition (6,310 residents). This is just above the rate nationally (48.7%). 11.0% of claimants suffer primarily from musculoskeletal or connective tissue disorders, lower than the rate nationally (13.3%).</p> <p>Some residents who are claiming ESA/IB will be included in the estimates of unemployment, but others may be counted as “economically inactive” instead (in the category of long-term sick or disabled). Of the 38,800 people aged 16-64 who are economically inactive in Lambeth (including other groups such as retired, full-time students, looking after the home), 21.6% want a job (ONS Annual Population Survey 2014). This means that some of our ESA/IB claimants are likely to want a job. Current government policy also means that many ESA/IB claimants are being required to engage in “work-related activity”.</p> <p>The draft SPD will have a positive impact on this group. It will enable us to work with developers, or use funding negotiated to identify opportunities and increase support for people with additional health needs.</p>
<p>2.2 Gaps in evidence base</p>	<p>The evidence we collected to inform our Investment and Opportunity Strategy and set employment and skills priorities for the borough, along with the Cumulative EIA produced as evidence to inform “Future Lambeth: Our borough plan” provide a comprehensive assessment of the impact of recent changes in demography, and policies on different groups within the population. These documents have been used to inform the planning obligations to be sought within the draft SPD.</p> <p>As specific projects and programmes are developed to implement the strategy further analysis or research may be necessary.</p>

3.0 Consultation, Involvement and Coproduction	
3.1 Coproduction, involvement and consultation	<p>The development of the Investment and Opportunity Strategy was the result of significant engagement with a broad range of partners and stakeholders. There was strong support through the strategy development process for economic growth to benefit local people. A full list of the stakeholders engaged in that process was set out in the Cabinet report in June 2015 (report 22/15-16).</p> <p>The strategy development process included a workshop with local developers and their representatives. At this workshop the developers expressed enthusiasm for working with local residents and communities, and recognised the potential benefits of having a skilled local workforce. The developers encouraged the Council to adopt a more flexible approach to seeking planning obligations relating to employment and skills. This has been reflected in the draft SPD.</p> <p>Members of the Planning Applications Committee have been consulted on the draft SPD, as well as contributing to the development process. These Members welcomed the development of the Employment and Skills SPD and support the more flexible approach that is proposed. The Members were keen to ensure that obligations agreed are monitored by officers, and that the draft SPD is a functional and user-friendly document.</p> <p>We are seeking approval to consult publicly on the draft SPD. The consultation will be open to responses from any interested parties, including local residents, developers and community groups. The consultation will follow the processes outlined in the Statement of Community Involvement, as approved by Council in September 2015 (report 62/15-16). The draft SPD will be published on the Council's website; hard copies will be made available at all Lambeth libraries; and the consultation will be sent electronically to everyone on the Council's planning consultation database. If there is demand for a public meeting or workshop on the draft SPD, this will be organised.</p> <p>The period for consultation proposed is for an eight week consultation period from December 2016 to February 2017 to allow as many people as possible to respond to the consultation. The feedback from the consultation would be analysed and the Council's response will be published.</p>
3.2 Gaps in coproduction, consultation and involvement	<p>We intend to undertake a comprehensive approach to consultation, as required by the legislation and in accordance with the Council's Statement of Community Involvement, as set out above.</p>

4.0 Conclusions, justification and action	
4.1 Conclusions and justification	<p>Overall the draft SPD should have a positive impact on Lambeth residents, enabling us to implement a better range of employment and skills activities to meet local need. In this way the draft SPD will help to achieve the priorities set out in “Future Lambeth: Our borough plan”, in relation to reducing inequalities, as well as those priorities agreed in the Investment and Opportunity Strategy.</p> <p>We will be providing greater focus on those residents who are long-term unemployed or at risk of becoming long-term unemployed; on young people, providing them with better opportunities to succeed in the future; and on ensuring that local residents benefit from the economic growth in the borough.</p> <p>We will consult on the draft SPD as set out in the previous section of this EIA.</p>
4.2 Equality Action plan	
Equality Issue	Mitigating actions
Ongoing monitoring of the impact of our interventions to support ethnic minority employment.	<p>Maintain regular oversight of programme outputs and local data sources. In particular, monitoring the impact across ethnicities, of new employment interventions, particularly those supporting people with health problems and who are long-term unemployed or in danger of becoming so.</p> <p>Ongoing, Helen Payne, Assistant Director, Welfare Employment and Skills</p>