

DWP Welfare to Work and  
Equality Group

**London City Strategy ESOL (English for Speakers of Other  
Languages) pilot**

## **Equality Impact Assessment for the London City Strategy ESOL (English for Speakers of Other Languages) pilot**

### **Name of strategy**

London City Strategy ESOL pilot. This is a pilot project which was announced in Budget 2007. It builds on existing ESOL policy (which has already been fully assessed for Equality impacts, and will be reviewed in the light of any proposed changes), but will focus on specific customer groups and deliver training in a work-focused manner tailored to the needs of Jobcentre Plus customers.

### **Purpose and aim**

Jobcentre Plus adviser guidance was changed in April 2007 to encourage customers to address their ESOL needs where these present a barrier to work. It is therefore important that there is sufficient, flexible, high-quality ESOL provision available. This programme aims to deliver ESOL provision with the specific aim of helping people move closer to the labour market, enter work and progress in employment. We hope that this can be used as a model programme to encourage providers to deliver ESOL in a more work-focused context in future, and potentially exert influence over the way ESOL funds are spent. We are also testing the efficacy of partnership working through this pilot, as it is being developed with the London City Strategy Pathfinders and delivered through the Learning and Skills Council. This could help to inform future work on joint commissioning.

### **Who will benefit mainly from this proposal or change?**

The main beneficiaries will be the programme participants. The target group is parents with language needs who are in receipt of benefits or tax credits, eligible to work in the United Kingdom and live or work in the London City Strategy.

However, it will not just be participants who benefit. As parents are the target group it is reasonable to assume that there will be a knock-on benefit to the rest of the family. Employers should also benefit from prospective recruits and employees having better language skills. Finally the wider community will also benefit through the use of a shared language, as outlined by the Commission on Integration and Cohesion<sup>1</sup>.

### **Equality impact of the policy**

This provision is additional to existing mainstream Learning Skills Council (LSC) provision, including that specifically targetted towards Jobcentre Plus customers (the Employability Skills Programme), for which equality impact assessments have been completed.

Whilst targetting particular sectors of need, potential providers have been asked to confirm that they understand and will comply with the relevant equality legislation.

---

<sup>1</sup> Commission on Integration and Cohesion, *Our Shared Future*, June 2007.

## **Race**

It is likely that a high proportion of those with English language needs and thus accessing the programme will come from an ethnic minority background. 70.6% of the 146,000 people in London who report language barriers in keeping or finding a job are from an ethnic minority group.<sup>2</sup> Under the exemptions in s.35 of the Race Relations Act the Department is able to provide training which is targeted on particular racial groups where it can be demonstrated that those groups have “special needs” in relation to such training and where this would justify the exclusion of other groups. Legal advice therefore is that it is allowable to provide English language training, which is likely to attract certain racial groups more than others. However in drawing up the specification with the City Strategy Pathfinders we shared with them concerns that focusing provision on certain ethnic groups within the range of those with language needs could be counted as direct discrimination and would not be permissible. Providers will be required to meet their obligations under the Race Relations (Amendment) Act.

## **Disability**

In West London, this provision is open to unemployed parent residents in the boroughs of Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon and Hounslow. In East and South East London CSP it covers the boroughs of Greenwich, Hackney, Tower Hamlet, Newham and Waltham Forest. The provision is open to parents on benefit who want to access support to improve language and literacy skills. It is designed to provide positive outcomes for participants and aims to promote equality and opportunity by helping people to obtain the skills they need to help them move closer to the labour market. In terms of providing equality of access for people with disabilities, providers will take steps to make reasonable adjustments for disabled customers with particular needs. For example, a parent with a visual impairment will be offered 'travel training' that enables them to be more confident in travelling to provider and employer premises. We will be evaluating our approach and consulting with customers on their experiences during and after their training.

## **Gender**

This pilot does not seek to target one gender more than the other. However, we did seek to investigate whether there could be any indirect impact. Data on ESOL need is not available at a local level, however we know that around 70% of those people in London who report language as a barrier to employment are women. This could imply that more participants will be female, however this is justifiable as it is based on indicators of the levels of need. A query was also raised as to whether the proposal to focus provision on parents could result in indirect gender discrimination. We do not think this is the case as analysis shows that English language is a problem for both mothers and fathers: the employment rate in London for mothers with dependent children who speak English as a second or

---

<sup>2</sup> Source: Labour Force Survey, Q3, 2006.

other language is a little more than half the rate of those with English as a first language,<sup>3</sup> and sixty per cent of non-employed fathers in London have English as a second language.<sup>4</sup> Whilst for cultural reasons some providers may seek to focus provision more on one gender than the other, overall we will ensure there is a balance in provision available and providers will be required to meet their obligations under the Sex Discrimination Act.

### **Next steps**

This is a small scale pilot (5,000 participants in London only) which as it progresses will continue to be monitored. Proposals being put forward by providers will be looked at to ensure these reflect the requirement not to discriminate against any groups. As part of the procurement process providers will have to satisfy the contracting body that they pay sufficient attention to equal opportunities. We will also collect details on at least some equality indicators as part of the Management Information required. This will be monitored as part of the evaluation process.

The evaluation will comprise two stages of qualitative interviews with pilot participants and staff involved in the delivery of the pilots, the first following the set up of the pilots and the second at the end of the pilots. Management information collected by the City Strategy Pathfinders will be analysed internally by DWP staff in order to measure pilot outcomes. It is expected that this analysis will focus on the destinations of pilot participants, without attempting to estimate additionality i.e. impact of the pilot.

We do not currently anticipate that this pilot will be rolled out nationally; instead we hope it will serve as a model and elements of good practice will be adopted in mainstream programmes (which already have Equality Impact Assessments and are reviewed accordingly when any changes are proposed).

### **Changes made**

Following legal advice we decided not to ask providers to focus support on particular racial groups (for example providing bi-lingual support in certain languages), as we were not confident this would be equitable in disadvantaging speakers of other languages by not providing similar support.

We also investigated whether the target groups for provision could lead to gender discrimination with a view to making possible changes; however no changes were deemed necessary as sufficient evidence was provided to support the proposal.

---

<sup>3</sup> Source: Greater London Assembly, *A profile of Londoners by language*, September 2006.

<sup>4</sup> Source: Lisa Harker, *Delivering on Child Poverty: what would it take?* November 2006.

**Name and contact details of the officer(s) responsible for the assessment:**

Laura Stuart

Department for Work and Pensions

Skills Directorate, Level 1, Caxton House, London SW1H 9NA.

Telephone: 020 7449 5429.

Email: [laura.stuart@dwp.gsi.gov.uk](mailto:laura.stuart@dwp.gsi.gov.uk).