Equality Impact Assessment (EqIA)

## Equality impact assessment helps SDS meet its obligations under the Equality Act 2010. In addition, SDS took the decision to use the impact assessment process to make progress as a Corporate Parent in relation to care experienced young people, which is a component part of the Children and Young People (Scotland) Act 2014. The process might also be used to consider other groups that SDS has evidence of experiencing discrimination or underrepresentation.

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| **Name of EqIA** (e.g. directorate, large project or service) | Work-based Learning Programmes |
| **Senior Responsible Officer (SRO):** name and job title | Fergus McMillan, Senior Equality & Diversity Advocate |

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| **Approved by:** | **Director of:** | **Date approved:** | **Review date:** |
| Katie Hutton | National Training Programmes | 1 July 2020 | 1 July 2023  (or at times of substantial change) |

1. **Purpose of project, policy or product**

This document covers the equality impact assessment for SDS’ work-based learning offer and associated projects, including:

* Foundation Apprenticeships
* Modern Apprenticeships
* Graduate Apprenticeships
* Foundation Apprenticeships at SCQF Level 4/5 Pilot
* Employability Fund (EF)

Evidence suggests that the most successful education and skills systems provide work-based learning within a broader career pathway. These systems engage young people with the world of work earlier and better prepare them to make effective transitions from education to employment. SDS aims to achieve this in Scotland by developing and delivering new apprenticeship models that expand the scale and reach of work-based learning options, and by strategically expanding existing Modern Apprenticeship provision.

These include:

* Foundation Apprenticeships – work-based learning qualification for secondary school learners who are making their senior phase subject choices. Foundation Apprenticeships are set at SCQF Level 6, the same level as a Higher. Young people learn and apply key skills and knowledge for their chosen sector. A significant part of that learning is done during meaningful work placement with an employer.
* Modern Apprenticeships – apprentices are employed and working towards an industry approved qualification. New employees or existing members of staff can undertake a Modern Apprenticeship. Modern Apprenticeships can be at SCQF Level 5 to 11 (Levels 8-11 may be referred to as Technical or Professional Apprenticeships).
* Graduate Apprenticeships – delivered by universities and colleges in partnership with employers. Graduate Apprentices are in paid employment with an employer. They spend around 80% of their time in work and 20% at university or college. This integration of work and learning means that the work they carry out day-to-day counts towards their qualification. Graduate Apprenticeships are at SCQF Levels 9, 10 and 11 (with a Higher Apprenticeship at Level 8).

For more information on SCQF levels please see [SQA SCQF Ready Reckoner](https://www.sqa.org.uk/sqa/files_ccc/B63338_SQA_A6_ready%20reckoner.pdf).

We also recognise the need to have clear pathways for individuals who are further from the labour market to enable them to develop and progress towards work-based learning or other education/employment outcomes. Therefore, we have also included the following projects/programmes within the scope of this document:

* Employability Fund – SDS administers the Employability Fund on behalf of Scottish Government. The fund is designed to be flexible around local need. SDS commissions employability provision in line with demand identified by local partners at Stages 2-4 of the [employability pipeline](http://www.employabilityinscotland.com/employability-pipeline/the-employability-pipeline/).
* SCQF Level 4/5 Foundation Apprenticeships – we are currently piloting Foundation Apprenticeships at SCQF Level 4 and 5 in schools. The pilots are taking place within the Construction, Automotive and Hospitality sectors.

**Considerations/Limitations**

There are a number of considerations that must be given to the context within which work-based learning is delivered including employer behaviour, funding and policy decisions, and the requirements of other stakeholders. SDS commissions and administers the funding support for work-based learning. While we can implement change within the scope of this remit and use the learning from any activity to influence stakeholders, there are limitations to the control that we have over some aspects of work-based learning delivery as outlined below.

**Covid-19**

It should be noted that this document was developed prior to the implementation of actions related to Covid-19 response. As the impact of Covid-19 response and recovery becomes apparent, then these actions will be reviewed and adapted to ensure they are still relevant and achievable.

**Employer Influence**

Modern and Graduate Apprenticeships are employment opportunities and, as such, the employer has control over their own recruitment and selection processes. 44% of Modern Apprenticeships have been in employment for 13 months or more[[1]](#footnote-2). Younger people are more likely to have been specifically recruited as a Modern Apprentice[[2]](#footnote-3) (75% compared to 51% overall). Similarly, around 70% of people starting a Graduate Apprenticeship were already in employment before starting their apprenticeship[[3]](#footnote-4). When apprentices are recruited from existing employees, they tend to reflect the under-representation of particular groups within the wider workforce, which in turn can result in under-representation in apprenticeships. The Employability Fund programme is not employment, it is designed to support unemployed people into work, and will usually include individuals who have additional barriers to work. Individuals are referred to the programme from partners such as Jobcentre Plus and SDS Careers Advisers.

Through our commissioning and contract management process with learning providers, SDS asks providers to set out proactive steps they can take to attract and support individuals from under-represented groups onto the programmes they administer. Responses from providers on their equality activity are scored and this scoring is considered during the contracting process. SDS offers training and resources on improving diversity and supporting under-represented groups to enable learning providers to implement effective practice. However, learning providers highlight the lack of influence they have over employer recruitment practices as a key challenge and an area for consideration by SDS and the Scottish Government. In order to have an impact on the participation of different groups on Apprenticeship programmes, SDS must continue to work with the Scottish Government and other relevant partners to identify how we can more generally influence the recruitment practices of employers and support individuals from equality groups into positive opportunities.

SDS established the Scottish Apprenticeship Advisory Board and the Apprenticeship Gender Commission, both of which are led by, and made up of, employers and have a specific focus on equality and diversity within apprenticeships. We also work with employers, employer bodies and employer groups/forums such as the Developing the Young Workforce groups in each local area.

**Career Choice**

Individuals have different needs and aspirations and are free to choose the career pathway that feels right for them. Our role is to ensure that individuals are aware of work-based learning opportunities to allow them to make an informed decision on the career pathway that is right for them. We must continue to take steps to identify and address any potential barriers for customers accessing work-based learning to ensure that these opportunities are inclusive and open to those who wish to undertake them.

**Rurality**

Across all equality groups, it should be noted that there can be additional challenges related to rurality. In more rural areas, there may be fewer employers or opportunities for individuals to engage in work-based learning. In these areas, the cost, time and availability of travel can have an additional impact on an individuals’ participation in work-based learning. This can be particularly challenging for Foundation Apprenticeships, where travel may be required during the day to move between schools and employer premises. SDS currently offers funding via the Rural Uplift to Modern Apprenticeship providers and we will continue to work with partners to address some of these challenges as outlined in the [Skills Action Plan for Rural Scotland.](http://www.skillsdevelopmentscotland.co.uk/media/45684/skills-action-plan-for-rural-scotland-full-report.pdf)

**Flexibility**

SDS continues to consider how flexibility can be built into the delivery of work-based learning models to adapt to individual need, whilst maintaining robust procedures to ensure that we are consistently delivering a high-quality service to individuals and employers, and ensuring the learning meets industry standards. However, it should be noted that both Foundation and Graduate Apprenticeship delivery is tied into the academic year with little scope to flex start and end dates. We will continue to work with our delivery partners to ensure that, within these parameters, there continues to be the ability to adapt assessment and support around individual need to give individuals the best chance of succeeding in their apprenticeship.

**National Minimum Wage**

There is a separate [National Minimum Wage](https://www.gov.uk/national-minimum-wage-rates) (NMW) specifically for apprentices which is set by the UK Government. Through our consultation and work with partners, it has been raised that this rate may present a challenge for those from disadvantaged or under-represented groups. However, consultation with learning providers suggested that most employers that they are working with pay the standard National Minimum Wage or the Living Wage, and that providers would actively encourage employers to pay the Living Wage as a minimum where possible. The National Minimum Wage, including the National Minimum Wage for Apprentices, is a reserved matter for the UK Government. As such, the rates of NMW are set by the UK Government and the Scottish Government has no enforcement remit over these rates. The Scottish Government is fully committed to promoting Fair Work practices throughout Scotland and will continue to press the UK Government for the full set of powers around employment law in order to allow us to fully deliver our Fair Work ambitions. SDS will continue to work with the Scottish Government and other partners to promote the various funding and support available to individuals on lower incomes and/or those who may require additional funding to enable them to apply for, and sustain, apprenticeship opportunities.

1. **Evidence and Impact**

Throughout this document, we have used a range of evidence including research, statistics and feedback from consultation activity. The main sources of information are:

* [Equality Evidence Review](https://www.skillsdevelopmentscotland.co.uk/media/45597/equality-diversity-mainstreaming-report-2019.pdf) – a literature review of key research into the education and employment outcomes for different equality groups. This is updated and published every two years as an appendix to our Equality Mainstreaming Report.
* [Employability Fund Statistics](https://www.skillsdevelopmentscotland.co.uk/media/46766/ef-statistics-quarter-4-2019-20.pdf) – data and analysis on the number of programme starts and achievements by age, disability, gender, ethnicity and care experience. This is published on our corporate website. The data used in this document is from 2019-20.
* [Foundation Apprenticeship Report 2020](https://www.skillsdevelopmentscotland.co.uk/media/45251/fa-progress-report.pdf) – data and analysis on number of Foundation Apprenticeship starts by disability, gender, ethnicity and care experience. This is published on our corporate website. The data used in this document is from Cohort 4 (2019-21).
* [Modern Apprenticeship Statistics](https://www.skillsdevelopmentscotland.co.uk/media/46765/modern-apprenticeship-statistics-quarter-4-2019-20.pdf) – data and analysis on number of Modern Apprenticeship starts and achievements by age, disability, gender, ethnicity and care experience. This is published on our corporate website. The data used in this document is from 2019-20.
* [Graduate Apprenticeship Report 2019](https://www.skillsdevelopmentscotland.co.uk/media/45882/ga-report-2019.pdf) - data on number of Graduate Apprenticeship starts by age, disability, gender, ethnicity and care experience. This is published on our corporate website. The data used in this document is from 2018-19.
* Participation data – we have also used data on participation across the Employability Fund, Foundation Apprenticeships, Modern Apprenticeships and Graduate Apprenticeships by religion. And participation by sexual orientation and transgender status for the Employability Fund, Modern Apprenticeships and Graduate Apprenticeships (we do not monitor this information for Foundation Apprenticeships).
* Consultation with learning providers (January 2020) – we consulted with over 80 learning providers delivering the Employability Fund, Foundation Apprenticeships, Modern Apprenticeships and Graduate Apprenticeships throughout Scotland during January and February 2020 to understand their views on the main challenges for different customer groups, and potential actions to improve participation and achievement. The high-level results have been incorporated into this document and a more detailed report from the consultation will also be used to inform planning by internal teams within SDS.
* Consultation with Career Information, Advice and Guidance (CIAG) staff – we conducted an online survey of CIAG staff across Scotland to understand their views on the main challenges for different customer groups, and potential actions to improve participation and achievement. We received over 50 responses and the high-level results have been incorporated into this document. A more detailed report from the consultation will also be used to inform planning by internal teams within SDS.
* Consultation with care experienced young people and their support workers – we conducted focus groups with care experienced young people and employability staff from Barnardo’s Scotland and Action for Children in 2019. We consulted them on their perception of apprenticeships and the main challenges for them in accessing apprenticeship opportunities. The feedback has been incorporated into this document.
* Young Carers and Modern Apprenticeships Research (2018) – we commissioned research into the views of young carers of apprenticeships and their perceptions of the main barriers for them in accessing apprenticeship opportunities. Relevant results from this research has been incorporated into this document.

Our data on participation is gathered via equality monitoring forms completed by each customer. The information provided is on the basis of self-disclosure so may be subject to under-reporting where individuals do not wish to disclose their information. SDS takes steps to ensure learning providers follow good practice in requesting equality information from customers to support high disclosure rates. All of our equality data is anonymised, we will not disclose equality data where numbers are small and there is the risk of identifying individuals.

Foundation and Graduate Apprenticeships are newer programmes and have smaller numbers of participants than Employability Fund or Modern Apprenticeships. As these programmes expand, we will continue to monitor participation by equality group to identify any trends and undertake relevant action to ensure equality of access for all.

We will continue to monitor participation on the Employability Fund and our apprenticeship programmes and, where appropriate, will commission and conduct further research or consultation to understand the barriers faced by certain groups in accessing these opportunities. For example, we are currently planning focus groups with ethnic minority customers to understand their perceptions of apprenticeships and any potential barriers to accessing them. We will continue to consult with key partners and customers to understand the needs of different groups and how we can collectively improve participation in work-based learning opportunities. The feedback and learning from these consultations, and other relevant research, will inform our future planning and activity.

The tables below provide an overview of the evidence for each protected characteristic and outlines the activity that SDS will undertake to address any areas of disadvantage and to proactively promote equality of opportunity for each group. Although the tables below separate the evidence and activity for each of the protected groups, it should be noted that individuals can fall into more than one category (e.g. disabled and female). We also know that actions that benefit one group may also be of benefit to the wider population, therefore we focus on identifying examples of effective practice in attracting, recruiting and supporting individuals and sharing these with others involved in the delivery of apprenticeships.

* 1. **Age**

**Context:** Younger and older workers continue to be the most disadvantaged in the labour market. Both groups are more likely to be unemployed and face barriers to entry and progression in work. Unemployment at a young age has long-term detrimental impact on employment, progression and pay.[[4]](#footnote-5)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| Foundation Apprenticeships are aimed at senior phase school pupils.  On Modern Apprenticeships, 61% of starts were age 16-24.  On Graduate Apprenticeships 18.5% were 16-19 year olds, 29% were 20-24 year olds, 24.9% were 25-34 year olds, 24.9% were 35-49 year olds, and 2.8% were 50+ years old.  On Employability Fund, 52% of starts were aged 16-17 (24% were aged 18-24, and 25% were aged 25+).  Disabled and care experienced individuals may have a later entry into the labour market.  The public funding contributions for Modern Apprenticeships vary by age in line with Scottish Government policy to support youth employment. Providers highlighted that this could potentially impact on older people accessing Modern Apprenticeships.  Providers gave many examples where funding for older individuals would have been beneficial. These included:   * Trying to attract under-represented groups, for example men into female dominated sectors (and vice versa). Some providers highlighted that they tend to find candidates from these groups are at an older age. * Disabled or care experienced individuals over the age of 29   Some providers highlighted older apprentices as a group who required additional support and time from their assessors (e.g. because they have not been involved in learning for a long time, because they do not have the core skill requirements, or because they need additional help with things like technology).  Providers also highlighted that older candidates may have grandchildren / caring responsibilities.  CIAG staff and Graduate Apprenticeship providers highlighted that people perceive apprenticeships as being ‘for young people’ which may put older people off applying.  The apprentice minimum wage might not be feasible for older workers, although the consultation with providers suggested that a small minority of employers offer this. | * Modern Apprenticeship Statistics 2019-20 * Graduate Apprenticeship Progress Report 2019 * Employability Fund statistics 2019-20 * Consultation – learning providers and CIAG staff | * Foundation Apprenticeships are for senior phase school pupils and are therefore targeted at a younger age group. The purpose of Foundation Apprenticeships is to provide young people with experience of the world of work to support their transition into further/higher education, training or employment post-school. * We have worked with Local Authorities to develop Foundation Apprenticeship delivery which maximises access for all young people * We have advertising and promotion campaigns to inform young people and parents/carers about Foundation Apprenticeships * Working with employers to promote the benefits of working more closely with schools and offering meaningful work placements and employment opportunities to young people * Information sessions for young people and parents/carers on work-based learning opportunities, particularly focusing on equality groups (e.g. disability or ethnic minority groups) * Modern Apprenticeship funding contribution rates are set by age, with higher funding rates being available for younger ages in line with SG Youth Employment Strategy * Enhanced funding up to the age of 29 is available for Modern Apprenticeships who are disabled and/or care experienced in recognition that these groups may have a later entry to the labour market. For 2020-21, Enhanced Funding for Modern Apprentices has been updated to focus on those who require additional support to undertake their apprenticeship in line with feedback from our consultation * Employers are encouraged to offer Scottish Living Wage where possible | * Continue to promote apprenticeship opportunities to young people in school and their parents/carers, with a particular focus on those with protected characteristics * Any future review of funding to include consideration of how funding can best support the participation of equality groups and Scottish Government policy priorities within existing budget parameters. In particular, these discussions should consider the Modern Apprenticeship funding rates and whether this would impact on participation of other equality groups such as disability, gender balance, etc. * Evaluation of the impact and effectiveness of the recent changes to Modern Apprenticeship Enhanced Funding for learning providers |

* 1. **Disability**

**Context:** Disabled people generally have poorer employment outcomes and are more likely to go into Further Education after school. Disabled people are more likely to be unemployed or under-employed than their peers, for example a disabled person with a degree is more likely to be unemployed than a non-disabled person without a degree.[[5]](#footnote-6)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * Reported Modern Apprenticeship participation by disabled people has increased over recent years to 15.4% * Achievement rates for disabled people on Modern Apprenticeships are lower than those who are not disabled (71% vs 78%), although this has increased from the previous year (69%) * Foundation Apprenticeship participation by disabled people is 16.3%%, a significant increase from the previous cohort (7.1%) * Graduate Apprenticeship participation by disabled people is lower at 7.8% * On the Employability Fund, 28.2% of participants were disabled * Providers overall are quite confident supporting disabled customers but welcomed additional training from SDS (particularly on mental health and autism) * Providers also welcomed support and advice from specialist disability organisations, particularly for those with more complex needs. * Some providers highlighted the need for more flexibility in pathways into apprenticeships for some disabled candidates as they may not be ready to undertake the level of qualification required for an Apprenticeship yet. * Providers also highlighted disclosure as a challenge, with some individuals not disclosing their disability/support needs until they have established a relationship with the provider. * Although disabled employees can access funding via Access to Work for workplace adjustments, Modern Apprenticeship and Graduate Apprenticeship providers both highlighted that there may be instances where the individual requires additional support for their learning which might not be covered by this funding * Providers and Careers Advisers both highlighted that some employers may lack understanding of the benefits of employing disabled people and how to access support for workplace adjustments. | * SDS Equality Evidence Review * Modern Apprenticeship Statistics 2019-20 * Foundation Apprenticeship Progress Report 2020 * Graduate Apprenticeship Progress Report 2019 * Employability Fund statistics 2019-20 * Consultation – learning providers and CIAG staff | See the [Apprenticeship Equality Action Plan Update](https://www.skillsdevelopmentscotland.co.uk/media/45850/apprenticeship-equality-action-plan-annual-report-2019.pdf) for current and previous activity, including:   * Working with partners to develop pre-employment projects to support disabled people to apply for apprenticeships * The Enhanced Support Modern Apprenticeship project which used the supported employment model to enable those with more complex needs to access and sustain apprenticeships (led by Enable Scotland) * Delivering training to providers to raise awareness of the needs of different customer groups and sharing good practice in supporting disabled apprentices * Raising awareness with learning providers of the different funding options available from SDS and other partners to help them support disabled individuals * Reviewing information on Apprenticeships to ensure it is accessible (marketing materials and digital services), including for BSL (British Sign Language) users, and that all marketing promotes a diverse range of positive role models. * Considering the needs of disabled people when developing frameworks to ensure they are flexible enough to be adapted to suit different support needs. In particular, ensuring entry requirements and level of core skills does not unnecessarily prevent anyone from undertaking the qualification. * From 2017-18, we have offered Enhanced Funding for disabled Modern Apprentices up to the age of 29. For 2020-21, this has been updated to focus on those who require additional support to undertake their apprenticeship and allows providers to apply for funding where an individual discloses this during their apprenticeship (in line with feedback from the provider consultation). | * With partners, explore any potential barriers in the pipeline between EF and apprenticeships to provide pathways for disabled people moving from the Employability Fund (and other employability programmes) * Explore opportunities to offer apprenticeships at a lower SCQF level and offer pathways into apprenticeships. We are currently piloting a Foundation Apprenticeship at SCQF Level 4/5. The learning from this pilot will inform future delivery. * Continue to review information on Apprenticeships for accessibility (marketing materials and digital services), including for BSL users, and ensure all marketing collateral promotes a diverse range of positive role models. * Work with Graduate Apprenticeship providers to understand any potential barriers for disabled individuals accessing Graduate Apprenticeships and develop relevant actions to address these. * Continue to raise awareness with learning providers of the different funding options available from SDS and other partners to help them support disabled individuals * Continue to provide training opportunities for providers to better understand the needs of different groups, particularly focusing on autism and mental health * Explore opportunities (along with SG) to promote the business benefits of employing disabled people[[6]](#footnote-7), and help employers to understand the different funding and support that is available to them * Provide opportunities for learning providers and employers to share good practice in recruiting and supporting disabled people into employment * Provide opportunities for learning providers/employers to meet with local equality organisations who can provide advice and support when recruiting disabled people * For Foundation Apprenticeships, we will implement an Equalities pilot in 2020 focused on supporting individuals with learning disabilities to participate. The learning from this will be used to inform future activity. |

* 1. **Gender reassignment** (sometimes under the heading of Transgender or Trans)

**Context:** This section looks at activity to address potential disadvantage faced by trans[[7]](#footnote-8) customers. For the trans community, there is little data available on employment outcomes. However, we know that trans people are less likely to be in employment than their peers. The Scottish Government estimates that around 0.6-1% of the population is transgender.[[8]](#footnote-9)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * Only 61% of trans people identified having paid work in the last 12 months in the National LGBT Survey (2017) (19% less than respondents overall) * Stonewall Scotland research (2017) identified that 39% of trans employees experienced negative comments and discrimination. * In 2018-19, 0.2% of Modern Apprenticeships identified as transgender. * Providers highlighted that some young people they work with who are transitioning have multiple and complex challenges and are not yet ready to progress into employment * CIAG staff also highlighted associated barriers for trans individuals such as having interrupted learning or mental health difficulties * Trans customers highlighted that being able to identify how they wish, and being addressed by the correct name/pronoun were important issues for them | * SDS Equality Evidence Review * Modern Apprenticeship participation data 2018-19 * Consultation – learning providers and CIAG staff | * We have worked with the Scottish Transgender Alliance to deliver sessions on transgender awareness to learning providers | * Continue to raise awareness of the needs and of trans individuals and the challenges they may face moving into employment to ensure providers are able to support individuals effectively * Promote apprenticeships to LGBT people including addressing gendered stereotypes that might impact upon the trans community * Ensure providers are aware of how to update name/title/gender on our customer database and ensure a simple process for allowing customers to identify how they wish * Expand options for gender on our equality monitoring form to ensure our monitoring is inclusive of trans and non-binary people * Link to actions about mental health (above) * Promote inclusive cultures that tackle bullying and discrimination with providers and employers |

* 1. **Pregnancy and maternity**

**Context:** EHRC research suggests that pregnant women can face discrimination and bias in the workplace. Evidence and activity for parents and carers is covered below under ‘Other Groups / Parents and Carers’.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * 40% of employers claim to have seen at least one pregnant woman in their workplace ‘take advantage’ of their pregnancy. * A third believe that women who become pregnant and new mothers in work are ‘generally less interested in career progression’ when compared to other employees in their company. * Four in 10 (41%) employers agreed that pregnancy in the workplace puts ‘an unnecessary cost burden’ on the workplace. | * [EHRC Pregnancy and Maternity Discrimination Research](https://www.equalityhumanrights.com/en/managing-pregnancy-and-maternity-workplace/pregnancy-and-maternity-discrimination-research-findings) | * Processes are in place to allow individuals to return to their apprenticeship following maternity * Due to the short-term nature of Employability Fund training, the ability to ‘pause’ and return to the training is not required * Processes are in place to allow individuals to raise concerns about discrimination | * Promote good practice in supporting pregnant employees to employers and providers. * Update provider guidance on supporting individuals to complete their apprenticeship following maternity leave |

* 1. **Race**

Context: Black and Minority Ethnic (BME) groups tend to do well at school and are more likely to go into Higher Education. However, they are also more likely to have poorer employment outcomes than the rest of the population. There are differences between different ethnic minority groups, but most research available does not disaggregate data to this level of detail. The evidence does show however that Gypsy Travellers in particular tend to have poorer educational outcomes than their peers.[[9]](#footnote-10)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * BME[[10]](#footnote-11) participation in the Modern Apprenticeship programme has increased year on year since 2014-15 from 1.4% to 2.4%. By comparison, the population of Scotland who identify as BME is estimated at 4% (Census, 2011), or at 6.4% for 16-24 year olds (Annual Population Survey, 2019). * Younger BME groups have lower participation rates on Modern Apprenticeships (54% of BME Modern Apprentices were age 16-24, compared to 61% of all Modern Apprentices) * BME groups have a slightly lower achievement rate to the overall Modern Apprenticeship population (70% VS 77% overall) * Foundation Apprenticeships have a higher BME participation rate (6.5% of Cohort 4). * Graduate Apprenticeships have a BME participation rate of 3.6%. * On the Employability Fund, 3.8% of participants are BME. * Refugees may face particular barriers such as a lack of awareness of Scottish provision, language barriers, and may have experienced trauma and/or have caring responsibilities. * Providers highlighted the difficulty in trying to attract more BME groups onto apprenticeships in areas of Scotland where the BME population is lower. * Providers also highlighted the difficulty in attracting BME groups to apprenticeships generally, and in particular sectors * CIAG staff highlighted a lack of understanding of apprenticeships amongst BME groups and a preference for Higher Education as a challenge in encouraging participation on apprenticeships * CIAG staff also felt there was a lack of representation/role models on apprenticeships for BME customers to aspire to * CIAG staff felt language was the main barrier for refugees accessing apprenticeship opportunities | * SDS Equality Evidence Review * SG Race Equality Action Plan * SG New Scots Strategy * Modern Apprenticeship Statistics 2019-20 * Foundation Apprenticeship Progress Report 2020 * Graduate Apprenticeship Progress Report 2019 * Employability Fund statistics 2019-20 * Consultation – learning providers and CIAG staff | See the [Apprenticeship Equality Action Plan Update](https://www.skillsdevelopmentscotland.co.uk/media/45850/apprenticeship-equality-action-plan-annual-report-2019.pdf) for current and previous activity, including:   * Introduction of additional funding for training providers (Ethnic Intersectionality Initiative) where they recruit a BME individual who has additional barriers to work (e.g. English as an Additional Language or caring responsibilities) * Working with partners to offer pre-employment support to enable BME people to access apprenticeships * Working with partners to link ESOL (English for Speakers of Other Languages) provision to apprenticeship opportunities * Working with partners to engage with Gypsy/Traveller communities to actively promote SDS’ services ([see CIAG Equality Action Plan](https://skillsdevelopmentscotland.sharepoint.com/sites/IShare/NationalTrainingProgramme/NTPDevelopment/Equal%20Opportunities%20Projects/Strategy%20and%20Policy/Equality%20Impact%20Assessment%202019/•%09Explore%20options%20for%20additional%20funding%20to%20support%20women%20into%20male%20dominated%20sectors)). | * Further explore the perceptions of apprenticeship by BME people to inform future approaches to attracting individuals from these groups * Use examples of Graduate Apprenticeship opportunities and higher-level apprenticeships to challenge perceptions of the level of apprenticeship study * Provide advice and guidance to employers and providers to take proactive steps to attract individuals from BME groups * Continue to actively seek positive case studies of BME individuals on apprenticeships and promote via schools and through our marketing and digital services * Work with refugee organisations and ESOL classes to raise awareness of apprenticeships * Work with providers to consider pathways from vocational ESOL onto apprenticeship programmes * Provide information about work-based learning opportunities in a variety of languages, particularly for parents/carers who do not have English as their first language. * Provide opportunities for providers and employers to share good practice in recruiting and supporting individuals from BME backgrounds * Provide information and support to providers to work with individuals from different cultural backgrounds, including refugees. |

* 1. **Religion or belief**

**Context:** There is little evidence in terms of education and employment outcomes from those from different faiths, although research shows that Muslims (particularly Muslim women) tend to have poorer employment outcomes.[[11]](#footnote-12)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * The data below appears to show that individuals identifying as having a religion/belief are under-represented, however these figures are impacted by a much larger proportion of Employability Fund participants and apprentices identifying as having ‘no religion’ compared to the wider population (69% of Employability Fund starts, 70% of Foundation Apprenticeships, 67% Graduate Apprenticeships and 71% Modern Apprenticeships compared to only 49% of the population) * In 2018-19, 1.7% of EF starts, 1% of Graduate Apprentices and 0.8% of Modern Apprentices identified as Muslim (compared to 1.6% of the Scottish population) * 9.5% of EF starts, 11% of Graduate Apprentices and 11.9% of Modern Apprentices identified as Roman Catholic (compared to 14.5% of the population) * 6.5% of EF starts, 12.3% of Graduate Apprentices and 8.6% of Modern Apprentices identified as Church of Scotland (compared to 24% of the population) * 2.9% of EF starts 3.9% of Graduate Apprentices and 3.1% of Modern Apprentices identified as Other Christian (compared to 7.8% of the population) * We do not have population statistics for other specific religions to allow for comparison | * SDS Equality Evidence Review * Modern Apprenticeship participation data 2018-19 * Graduate Apprenticeships participation data 2018-19 * Employability Fund participation date 2018-19 * [Scottish Government Equality Evidence Finder](https://scotland.shinyapps.io/sg-equality-evidence-finder/) (population data) | * Awareness raising with learning providers on religion/belief and tackling hate speech | * Continue to raise awareness with providers and employers of the potential barriers to employment that individuals from different backgrounds may face * Explore the barriers/challenges which contribute to poorer employment outcomes for Muslim men and women to inform future approaches to support this group * Work with community organisations who support Muslim men and women to raise awareness of apprenticeship opportunities * Monitor uptake of Foundation and Graduate Apprenticeships by religion as the programmes expand and look for opportunities to promote pathways between Foundation, Modern and Graduate Apprenticeships where appropriate. |

* 1. **Sex** (or Gender)

**Context:** Gender imbalances continue across subject and career choices and gendered choices can be seen from a young age. Girls tend to outperform boys at school and are more likely to go into Higher Education. However, women tend to be disproportionately represented in low quality, low paid work, while men are over-represented within STEM (Science, Technology, Engineering and Maths) sectors and in senior roles.[[12]](#footnote-13)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * Women represent 40% of Modern Apprenticeship starts. This gender split is seen across all levels of Modern Apprenticeship, with a slightly higher proportion of females at Level 3 and above (76.9% of women vs 73.5% of men) * Gender imbalance exists within particular frameworks, for example Construction and Related frameworks have only 2% female starts. Whereas men are under-represented in other frameworks, such as Health and Social Care. * However, there has been progress. For example, the number of female starts within Construction and Engineering Modern Apprenticeships were the highest recorded in the last 6 years * The gender imbalance within certain Modern Apprenticeship frameworks can also be seen across Foundation and Graduate Apprenticeships * Women’s participation continues to be a particular issue as apprenticeships are expanding within STEM sectors. Women currently make up 23.6% of Foundation Apprenticeships, 10.4% of Modern Apprenticeships, and 19.4% of Graduate Apprenticeships within STEM frameworks, reflecting the under-representation of women across the wider workforce in these sectors (it is estimated that women make up 25% of the STEM workforce[[13]](#footnote-14)) * Achievement rates for men and women on Modern Apprenticeships are the same (77%). * Graduate Apprentices are predominantly male, although female participation has increased from 17.8% (2017-18) to 34.3% (2018-19) * On the Employability Fund, 33% of participants are female and their achievement rates were slightly higher than for males (74.5% vs 72.5%) * Women are more likely to have unpaid caring responsibilities. * Both providers and CIAG staff highlighted that for some opportunities there is a lack of interest/applications from the under-represented gender in that sector. | * SDS Equality Evidence Review * SG A Fairer Scotland for Women: gender pay gap action plan * Modern Apprenticeship Statistics 2019-20 * Foundation Apprenticeship Progress Report 2020 * Graduate Apprenticeship Progress Report 2019 * Employability Fund statistics 2019-20 * Consultation – learning providers and CIAG staff | See the [Apprenticeship Equality Action Plan Update](https://www.skillsdevelopmentscotland.co.uk/media/45850/apprenticeship-equality-action-plan-annual-report-2019.pdf) for current and previous activity, including:   * Promoting the business benefits of gender equality to employers in sectors with a known gender imbalance through employer bodies and groups such as Developing the Young Workforce and the Scottish Apprenticeship Advisory Board * Supporting providers and employers to take positive action to recruit men/women into gender imbalanced sectors * Pilot of the Improving Gender Balance project to address gender stereotyping in schools and early years (now being mainstreamed by Education Scotland) * The development of the employer-led [Gender Commission](https://www.skillsdevelopmentscotland.co.uk/what-we-do/apprenticeships/the-scottish-apprenticeship-advisory-board/gender-commission/) which aims to develop recommendations and proposals that offer business-ready, practical solutions on what employers can do now, and in the future, to address any real or perceived barriers to improving gender diversity in their workforce. * Considering gender equality during the development of apprenticeship frameworks (including reviewing the language used to describe frameworks and allowing flexibility to adapt to the learners’ needs). * Modern Apprenticeships can be undertaken on a part-time basis, depending on the needs of the employer | * Continue to promote individuals working in non-stereotypical roles through our marketing and digital services * Marketing messages should particularly focus on the benefits of work-based learning to ensure it is viewed on equal terms with other career pathways and traditional academic routes * Use examples of Graduate Apprenticeship opportunities and higher-level apprenticeships to challenge perceptions of the level of apprenticeship study * Encourage employers to offer flexible working * Work with learning providers and employers in the key sectors where the gender imbalance is the most pronounced to identify challenges and take proactive steps to attract and retain talent * Work with partners and employers to generate interest in non-stereotypical roles at a younger age by working with schools, careers advisers and parents/carers to broaden their understanding of work-based learning and the opportunities in different sectors * Working with the Improving Gender Balance officers in schools to raise awareness of work-based learning opportunities * Provide opportunities for providers and employers to share best practice around recruiting and support individuals from under-represented genders * Support learning providers and employers to undertake good practice such as engaging with schools, taking positive action in recruitment, and providing mentoring support to help retain talent * Explore options for specific project activity aimed at addressing the gender imbalance in apprenticeships within certain sectors |

* 1. **Sexual orientation**

**Context:** Data on Lesbian, Gay and Bisexual (LGB) groups in terms of employment outcomes is limited. The Scottish Government estimates the LGB population as 2.4%.[[14]](#footnote-15)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * Stonewall Scotland research (2017) identified 17% of LGB employees had been bullied/harassed at work * In 2018-19, 3% of Graduate Apprenticeships and 3.2% of Modern Apprenticeships identified as LGB. * On Modern Apprenticeships, LGB apprentices tend to have slightly lower achievement rates (69% vs 76% in 2018-19) | * SDS Equality Evidence Review * Modern Apprenticeship (internal statistics) * Graduate Apprenticeships (internal statistics) | * Worked with Stonewall Scotland to deliver sessions on developing an inclusive workplace culture to learning providers | * Promote inclusive cultures that tackle bullying and discrimination with providers and employers * Promote good practice to providers and employers in supporting LGB employees in the workplace |

1. Assessing impact on other groups

This section considers the impact on groups not covered in the Equality Act (2010) who may also experience potential barriers or disadvantage within the labour market.

* 1. **Care experience**

**Context:** Care experienced young people tend to disengage from school at an earlier opportunity and are therefore more likely to leave school with little/no qualifications. The proportion of care experienced young people moving into Further or Higher Education is low but is increasing within Further Education. At all levels of education, care experienced young people tend to have lower levels of attainment than their peers.[[15]](#footnote-16)

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * Modern Apprenticeship participation by care experienced young people has increased over the last 5 years from 0.9% to 1.7% * Achievement rates for care experienced people are lower than those who are not care experienced (64% vs 77%), although this has increased from 59% in the previous year * Foundation Apprenticeship participation by care experienced people was 2.4% * Graduate Apprenticeship participation by care experienced people was 0.5%, which may reflect their lower participation in Higher Education * On the Employability Fund, 7% of participants identified as care experienced.   Through consultation, some of the key barriers to employment for care experienced young people identified were:   * Lack of qualifications / relevant work experience * Lack of networks / awareness of opportunities * Lack of understanding from employers * Cost of travel * Housing issues * Convictions * May move around which can impact learning at school and employment opportunities | * SDS Equality Evidence Review * Modern Apprenticeship Statistics 2019-20 * Foundation Apprenticeship Report 2020 * Graduate Apprenticeship Progress Report 2019 * Employability Fund statistics 2019-20 * Consultation – learning providers and CIAG staff * Consultation with care experienced young people and Action for Children / Barnardo’s staff | See the [Apprenticeship Equality Action Plan Update](https://www.skillsdevelopmentscotland.co.uk/media/45850/apprenticeship-equality-action-plan-annual-report-2019.pdf) for current and previous activity, including:   * Working with partners to raise awareness of apprenticeships and support care experienced young people to apply for opportunities * Improving awareness and understanding of providers of the needs of care experienced young people * For 2020-21, Enhanced Funding for care experienced Modern Apprentices has been updated to focus on those who require additional support to undertake their apprenticeship and allows providers to apply for funding where an individual discloses this during their apprenticeship (in line with feedback from the provider consultation). * Travel for Foundation Apprentices is provided by the Local Authority, and travel for Graduate Apprentices is provided by the employer. * Employers are encouraged to offer Scottish Living Wage where possible | * With partners, explore any potential barriers in the pipeline between the Employability Fund and Apprenticeships to provide pathways for care experienced young people moving from the Employability Fund (and other employability programmes) * We are currently piloting a Foundation Apprenticeship at SCQF Level 4/5 which is aimed at pupils from S3 onwards which gives us the opportunity to engage with young people prior to them leaving school, even where they leave after S4 * Learning from this pilot should inform future approaches to further develop pipelines into work-based learning opportunities for this group * Promote positive role models from this group in our marketing and via our digital services. * Raise awareness with providers and employers of the needs of care experienced young people and how to support them more effectively * Provide opportunities for providers and employers to share good practice in supporting care experienced young people, such as offering mentoring support and providing flexibility to allow the individual to deal with other issues that they may have in their personal life * Provide opportunities for providers and employers to network with equality organisations support this customer group * Raise awareness of employers of how to support people with convictions into work * Continue to raise awareness with learning providers of the different funding options available from SDS and other partners to help them support care experienced individuals * Consider options to support pupils participating in Foundation Apprenticeships who may move from one Local Authority to another during their learning or placement. |

* 1. **Parents/Carers**

**Context:** Our research and consultation suggests that parents and carers are another group who may face additional challenges in accessing work-based learning opportunities.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * The main barriers to apprenticeships for young carers were the ‘benefits trap’ of being unable to move to paid employment which would impact on their own/the household benefits, and the perception that other options such as college would be more flexible around their caring responsibilities * The research also highlighted that employers’ understanding of how they can best support carers in the workplace could be improved * Consultation with providers suggested that the cost of travel and childcare, and lack of childcare provision were key barriers for parents/carers | * Young Carers and Modern Apprenticeships research * Consultation – providers and CIAG staff | * We have undertaken sessions for learning providers on good practice in supporting individuals with caring responsibilities * Reviewing support arrangements for Modern Apprenticeships with caring responsibilities has been included within the specifications for learning providers * Travel for Foundation Apprentices is provided by the Local Authority, and travel for Graduate Apprentices is provided by the employer * Modern Apprenticeships can be undertaken on a part-time basis, depending on the needs of the employer * Through our commissioning process with learning providers, we encourage the implementation of Fair Work practices for providers and the employers that they work with | * Promote positive role models through our marketing and digital services * Encourage employers to provide more flexible working opportunities * Provide opportunities for employers and providers to share good practice in supporting carers * Work with Scottish Government to review existing funding for parents/ carers moving into employment and how well existing funding sources (such as benefits and any other allowances) are promoted to these groups, particularly for those earning the National Minimum Wage for Apprentices. [[16]](#footnote-17) |

* 1. **Socio-economic**

Context: The [Annual Participation Measure for 16-19 year olds in Scotland](https://www.skillsdevelopmentscotland.co.uk/media/44876/2018_annual-participation-measure-report.pdf) shows that those who live in more deprived areas were less likely to be reported as participating in education, employment or training. There are 84.2% 16-19 year olds participating from the most deprived areas (decile 1) compared to 97.1% from the least deprived areas (decile 10).

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| * There are more Modern Apprenticeship starts in the 10% most deprived areas in Scotland (decile 1) than there are from the 10% least deprived areas (decile 10). * Achievement rates on Modern Apprenticeships were 74% for the 10% most deprived areas (decile 1), and 78% in the 10% least deprived areas (decile 10). * Consultation with learning providers highlighted that poverty can be an overarching factor which can worsen the impact of some of the financial considerations for equality groups highlighted in other sections of this document | * Modern Apprenticeship Statistics 2019-20 * Consultation with learning providers | * SDS supports the Scottish Government’s ambitions for Fair Work and will continue to promote Fair Work practices to employers * Information is issued to all new Modern Apprentices outlining their employment rights, including National Minimum Wage | * Continue to monitor starts and achievement rates for Modern Apprenticeships by SIMD area to highlight any trends * Monitor participation in other apprenticeship programmes by SIMD area * Continue to raise awareness with learning providers, employers and individuals of the relevant funding/support available to enable individuals to participate in apprenticeships * Raise awareness with learning providers of the different funding options available from SDS and other partners to help them support individuals who have additional barriers to work |

1. [Modern Apprenticeship Statistics 2019-20](https://www.skillsdevelopmentscotland.co.uk/media/46765/modern-apprenticeship-statistics-quarter-4-2019-20.pdf) [↑](#footnote-ref-2)
2. [Modern Apprenticeship Outcomes Report 2016](http://www.skillsdevelopmentscotland.co.uk/media/42085/ma-outcomes-report-2016-final.pdf) [↑](#footnote-ref-3)
3. [Graduate Apprenticeship Report 2019](https://www.skillsdevelopmentscotland.co.uk/media/45882/ga-report-2019.pdf) [↑](#footnote-ref-4)
4. SDS Equality Evidence Review 2019 [↑](#footnote-ref-5)
5. SDS Equality Evidence Review 2019 and the Scottish Government’s A Fairer Scotland for Disabled People Plan [↑](#footnote-ref-6)
6. [A Fairer Scotland for Disabled People Action Plan](https://www.gov.scot/publications/fairer-scotland-disabled-people-employment-action-plan/) [↑](#footnote-ref-7)
7. SDS use the broader definition of ‘Trans’, to include trans women and men, non-binary and cross-dressing people. It is recognised that intersex is separate, and that intersex people may identify as men, women or non-binary. [↑](#footnote-ref-8)
8. SDS Equality Evidence Review 2019 and [**Scottish Government Equality Evidence Finder**](https://scotland.shinyapps.io/sg-equality-evidence-finder/) [↑](#footnote-ref-9)
9. SDS Equality Evidence Review 2019 [↑](#footnote-ref-10)
10. SDS defines ‘BME’ as those individuals who have identified themselves as being in the following categories on our Equality Monitoring Form: Mixed or Multiple; Asian; African; Caribbean or Black; and Other ethnic group [↑](#footnote-ref-11)
11. SDS Equality Evidence Review 2019 [↑](#footnote-ref-12)
12. SDS Equality Evidence Review 2019 [↑](#footnote-ref-13)
13. [Equate Scotland](https://equatescotland.org.uk/about/the-issue/) [↑](#footnote-ref-14)
14. SDS Equality Evidence Review 2019 and [**Scottish Government Equality Evidence Finder**](https://scotland.shinyapps.io/sg-equality-evidence-finder/) [↑](#footnote-ref-15)
15. SDS Equality Evidence Review 2019 [↑](#footnote-ref-16)
16. It is noted that carers in Scotland may be eligible for Carers Allowance and Carers Allowance Supplement dependent on meeting the eligibility criteria. [↑](#footnote-ref-17)