

EQIA Submission – ID Number

Section A

EQIA Title

CLS Kent Training and Apprenticeships - Apprenticeship Provision

Responsible Officer

Janice Denyer - CY EDSSEN

Approved by (Note: approval of this EqIA must be completed within the EqIA App)

Jude Farrell - CY EDSSEN

Type of Activity

Service Change

Service Change

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

No

Strategy/Policy

No

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Children Young People and Education

Responsible Service

Community Learning and Skills

Responsible Head of Service

Jude Farrell - CY EDSSEN

Responsible Director

Christine McInnes - CY EDSSEN

Aims and Objectives

Funding changes by the Department for Education (DfE) / Education and Skills Funding Agency (ESFA) came into effect from 1st August 2024 with a subsequent cut in CLS funding of £521k announced in March 2025 and implemented from 1st August 2025. These changes have required CLS to undertake significant reform to ensure it continues to deliver vital core skills to the residents of Kent and remain within the new terms of the funding contract and to remain financially viable. The apprenticeship programme was not included in previous reform which focussed on the funding changes to the 'Adult Skills Fund' provision.

KCC CLS Apprenticeship provision has been subject to two restructures over the last 5 years, the first following an Ofsted 'Requires Improvement' grade, with a second trying to move the apprenticeship provision to a viable position. Whilst the quality of the provision is now good in all areas, the department continues to deliver at a loss. At present there are 44 apprentices on programme and it is expected to deliver at a loss of £76160k during this financial year.

Whilst this area was not previously prioritised as an area of further change, current pressures require revised consideration of how best to allocate limited resources. Continuing to provide a non-viable, non-statutory service is no longer sustainable without it impacting other essential areas/ services
Opportunities to move existing apprentices to complete their apprenticeships with other local providers

will be explored.

The proposed decision is to close the provision and endeavour to relocate apprentices to other providers.

Closing the Apprenticeship provision would require the exploration of other external provisions who would be able to accept partially completed apprentices. Staff costs could be reduced in the short-term through diminution, but this runs the usual risk of staff leaving in the meantime.

The EQIA will review the impact on both current staff, employers and apprentices.

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?

Yes

It is possible to get the data in a timely and cost effective way?

Yes

Is there national evidence/data that you can use?

No

Have you consulted with stakeholders?

No

Who have you involved, consulted and engaged with?

Whilst we have not consulted specifically regarding the closure of the current provision, as we would not wish to cause stress or panic, we have engaged with tutors and employer adviser regarding viability and increasing new employer engagement over the past 18 months.

Tutors – engaged through conversation regarding viability and requesting input and suggestions to increase employer engagement.

Employer Adviser – engaged through conversations to increase the number of employer partnerships over the past 18 months

Skills England– regarding the proposed increase in funding bands for apprenticeships and the introduction of a new Level 2 Administration Assistant Apprenticeship Standard.

Employers - to engage regarding their potential future needs and how these can be accommodated.

Department of Education - regarding the reduction in provision and how the roll-off of apprenticeships will be managed.

Has there been a previous Equality Analysis (EQIA) in the last 3 years?

Yes

Do you have evidence that can help you understand the potential impact of your activity?

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

Service users/clients

Staff

Staff/Volunteers

Residents/Communities/Citizens

Residents/communities/citizens

Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?								
Yes								
Details of Positive Impacts								
<ul style="list-style-type: none">Reduce the financial reliance on other funding streams to fund gaps in income and , therefore, reduce potential Adult Skills Fund funding rules breach.Less competition amongst Kent providers supporting better joined-up working.								
Negative impacts and Mitigating Actions								
19.Negative Impacts and Mitigating actions for Age								
Are there negative impacts for age?								
Yes								
Details of negative impacts for Age								
<p>•Staff - whilst data has not been available due to the small levels of staffing and the potential of identifying individuals, I can confirm that the team's ages range from early 30's to early 70's with some staff continuing to work past the State Pension Age, which could cause difficulties in locating suitable redeployment.</p> <p>Apprentices -</p> <table><tr><td>Age</td><td>16-18</td><td>19-23</td><td>24+</td></tr><tr><td>% of provision</td><td>43.59%</td><td>47.44%</td><td>8.97%</td></tr></table> <p>Moving to a new provision mid-Standard can be disruptive for the individual due to the lack of consistency across the different provisions. This may impact different-aged apprentices in different ways. In experience it is often the youngest and oldest apprentices that struggle with change.</p> <p>Employers - unknown</p>	Age	16-18	19-23	24+	% of provision	43.59%	47.44%	8.97%
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Mitigating Actions for Age								
<p>Staff - there are other training providers and educational settings across the County where staff can transfer their skills</p> <p>Apprentices - apprentices will be reviewed on an individual basis to ensure they are offered the best support to ensure a positive achievement of their apprenticeship.</p> <p>Employers - some employers have worked with us for many years; we will support them in locating new provisions.</p>								
Responsible Officer for Mitigating Actions – Age								
Janice Denyer								
20. Negative impacts and Mitigating actions for Disability								
Are there negative impacts for Disability?								
Yes								
Details of Negative Impacts for Disability								
<p>Staff - whilst data has not been available due to the small levels of staffing and the potential of identifying individuals, I can confirm that approximately 12% of the team consider to have a disability and 36% of the team have reasonable adjustments in place, which could impact on them finding suitable employment</p> <p>Apprentices -</p> <p>19% consider themselves to have a disability</p> <p>81% do not consider themselves to have a disability</p>								

Adjusting to a new tutor and training provider could have a negative impact on their ability to achieve a successful apprenticeship outcome.
Employers – unknown
Mitigating actions for Disability
Staff - support will be implemented to prepare for a change in employment
Apprentices - apprentices will be reviewed on a case-by-case basis to ensure the correct decision is made on whether they complete with KTA or a new provider.
Employer - unknown
Responsible Officer for Disability
Janice Denyer
21. Negative Impacts and Mitigating actions for Sex
Are there negative impacts for Sex
Yes - Add details of the negative impacts and mitigations.
Details of negative impacts for Sex
Staff - whilst data has not been available due to the small levels of staffing and the potential of identifying individuals, I can confirm that approximately 22% of the team identify as male. Therefore, those identifying as female would be more greatly impacted by the changes suggested.
Apprentices - 77% of the apprentices identify as being female, indicating that females will be impacted more.
Mitigating actions for Sex
Opportunities should be available through other providers across the County
Responsible Officer for Sex
Janice Denyer
22. Negative Impacts and Mitigating actions for Gender identity/transgender
Are there negative impacts for Gender identity/transgender
No. Note: If Question 22a is "No", Questions 22b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Gender identity/transgender
Not Completed
Mitigating actions for Gender identity/transgender
Not Completed
Responsible Officer for mitigating actions for Gender identity/transgender
Not Completed
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
No. Note: If Question 23a is "No", Questions 23b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Race
Not Completed
Mitigating actions for Race
Not Completed
Responsible Officer for mitigating actions for Race
Not Completed

24. Negative impacts and Mitigating actions for Religion and belief
Are there negative impacts for Religion and belief
No. Note: If Question 24a is "No", Questions 24b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Religion and belief
Not Completed
Mitigating actions for Religion and belief
Not Completed
Responsible Officer for mitigating actions for Religion and Belief
Not Completed
25. Negative impacts and Mitigating actions for Sexual Orientation
Are there negative impacts for Sexual Orientation
No. Note: If Question 25a is "No", Questions 25b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Sexual Orientation
Not Completed
Mitigating actions for Sexual Orientation
Not Completed
Responsible Officer for mitigating actions for Sexual Orientation
Not Completed
26. Negative impacts and Mitigating actions for Pregnancy and Maternity
Are there negative impacts for Pregnancy and Maternity
No. Note: If Question 26a is "No", Questions 26b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Pregnancy and Maternity
Not Completed
Mitigating actions for Pregnancy and Maternity
Not Completed
Responsible Officer for mitigating actions for Pregnancy and Maternity
Not Completed
27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships
Are there negative impacts for Marriage and Civil Partnerships
No. Note: If Question 27a is "No", Questions 27b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Marriage and Civil Partnerships
Not Completed
Mitigating actions for Marriage and Civil Partnerships
Not Completed
Responsible Officer for Marriage and Civil Partnerships
Not Completed
28. Negative impacts and Mitigating actions for Carer's responsibilities
Are there negative impacts for Carer's responsibilities
Yes - Add details of the negative impacts and mitigations.
Negative impacts for Carer's responsibilities
Staff - KCC offer flexible working and the ability to manage own diary around working from home, which may not be available in other work settings.
Mitigating actions for Carer's responsibilities
None
Responsible Officer for Carer's responsibilities

