

# REAL JOBS NOW!

---

**PPR consultation response to Belfast City Council's  
draft Policy on the use of Social Clauses in Council  
Contracts & Equality Screening Document**

February 2015



Participation and the  
Practice of Rights

**RIGHT TO WORK : RIGHT TO WELFARE**



*Accountability. Equality. Participation.*

## **1. About PPR & our Interest in the Use of Social Clauses...**

1.1. Participation and the Practice of Rights (PPR) organisation provide tools and support to marginalised groups actively asserting their right to participate in economic and social decisions which affect their lives. PPR currently works to support a range of groups affected by issues with, for example, social housing, mental health service delivery and long term unemployment and welfare support. More recently this work has expanded further to support groups affected by difficulties in accessing education as well as those affected by domestic violence.

1.2. PPR's submission to this consultation reflects our work to support the Right to Work: Right to Welfare (R2W) Group's campaign for REAL JOBS NOW!. PPR has also worked on a range of projects in the area of employment which are of relevance to the scope of this draft policy.

1.3. These projects include Girdwood Barracks, the Lower Shankill Regeneration Board and in our capacity as advisors to the Minister for Culture, Arts and Leisure's in the development of social clauses for her multi-million pound stadia redevelopment scheme.

1.4. As the draft *Policy on the Use of Social Clauses in Council Contracts* is the main mechanism by which Council intends to implement REAL JOBS NOW!, this consultation response assesses the proposed policy against the commitments Council made to ensure the motion's delivery.

1.5. It should be noted that this current policy covers only one aspect of the REAL JOBS NOW! which sought to maximise the provision of employment for the long term unemployed through the Council's use of planning and regulatory powers in addition to the use of social clauses. We are concerned that there does not seem to be any advances in this area to date, and look forward to seeing Council using the full range of its powers to create meaningful and guaranteed outcomes for the long-term unemployed.

## **2. Support for REAL JOBS NOW!**

2.1. Belfast City Council passed the REAL JOBS NOW motion in February 2014 which stated;

*"That this Council recognises the increasing social and economic hardship experienced by people in our communities as a result of growing unemployment and cuts to welfare benefit; council accepts it has a duty to use the powers available to it (including but not limited to planning, regulation and procurement powers), to generate positive outcomes for the most marginalised in our communities and hereby commits to include a 'Real Jobs' clause at every available opportunity, in contracts tendered by council to procure goods, services and capital works. The 'Real Jobs clause' will guarantee ring fenced, fully paid jobs and apprenticeships for the long-term unemployed (12+ months)"*

2.2. Not only did the motion receive widespread support in City Hall, it was also backed by the people of Belfast including 51 organisations<sup>1</sup> working in all areas of the the city and a petition with over 2000 signatures. It is significant that of these signatures, 1500 were collected at Social Security Offices across Belfast: Anderstonstown (West), Shankill (West),

---

<sup>1</sup> Please see list of organisations /individuals who called for Belfast City Council to pass and implement the REAL JOBS NOW motion.

Falls Road (West), Holywood Arches (East), Corporation Street (North & East), Shaftesbury Square (South) and Chichester Street Job Centre (City Centre).

2.3. The motion has also attracted attention and support at the international level. The United Nations Special Rapporteur on Extreme Poverty and Human Rights, Ms Magdalena Sepúlveda Carmona issued a statement of support referring to the work to have the motion implemented as “*promising practice*” and “*crucial*”<sup>2</sup>.

### **3. Unemployment & the Need for REAL JOBS NOW!**

3.1. The level of public support for the REAL JOBS NOW motion’s implementation is highly significant but arguably more so is the undoubted scale of the need for such a policy.

3.2. **Whilst there has been a fall in the numbers of people claiming unemployment benefit**, in the vast majority of cases this reduction is not attributable to people getting a job. According to Department of Enterprise, Trade and Investment (DETI) Claimant Count Outflows by Destination statistics<sup>3</sup>, last month (December 2014) **only 39% of those who stopped claiming benefit did so because they found work.**

3.3. Looking at the figures over the course of a full year (from December 2013- November 2014) the situation for people who are long term unemployed (defined as having been unemployed for one year or longer) is even more stark. In the last year less than a quarter (24%) of the long term unemployed in Northern Ireland who stopped claiming benefit did so because they found work and for those who have been unemployed for over five years, this dropped further with only 15% of these people able to stop claiming unemployment benefit because they got a job<sup>4</sup>.

3.4. Additionally, according to further government statistics produced by NINIS (the Northern Ireland Neighbourhood Information Service)<sup>5</sup> **it is twice as likely that those who become unemployed will remain so for longer** with almost one third of all unemployment claimants in receipt of Job Seekers Allowance for over one year; compared to 14% back in 2009.

3.5. It should further be noted that the implementation of effective and robust social clauses by Belfast City Council, as prescribed in the REAL JOBS NOW motion, has the potential to alleviate the entrenched long term unemployment which afflicts much of our city.

As **TABLE 1** below shows, according to the 2010 Northern Ireland Neighbourhood Information Service Northern Ireland Multiple Deprivation Measure, 19 of the top 25 most deprived areas in Northern Ireland are in Belfast. This pattern is not new, with Multiple Deprivation measurements in 2005, 2001 and 1991 all recording similar results.

---

<sup>2</sup> To view Ms Magdalena Sepúlveda Carmona’s statement in full, please see <http://pprproject.org/real-jobs-now-motion-moves-forward-through-city-hall>

<sup>3</sup> Please see Claimant Count (particularly Outflows by Destination) statistics available here [http://www.detini.gov.uk/index/what-we-do/deti-stats-index/labour\\_market\\_statistics/stats-claimant-count.htm](http://www.detini.gov.uk/index/what-we-do/deti-stats-index/labour_market_statistics/stats-claimant-count.htm)

<sup>4</sup> Please see Total Annual Outflows by Destination statistics available here [http://www.detini.gov.uk/index/what-we-do/deti-stats-index/labour\\_market\\_statistics/stats-claimant-count.htm](http://www.detini.gov.uk/index/what-we-do/deti-stats-index/labour_market_statistics/stats-claimant-count.htm)

<sup>5</sup> Please see NINIS Claimant Count Long Term Unemployed Annual Averages available here <http://www.ninis2.nisra.gov.uk/public/Theme.aspx?themeNumber=18&themeName=Labour%20Market>

**TABLE 1:** NINIS Multiple Deprivation Measure 2010: 25 Most Deprived Super Output Areas

Whiterock_2	Belfast	1
Whiterock_3	Belfast	2
Falls_2	Belfast	3
Falls_3	Belfast	4
New Lodge_1	Belfast	5
Shankill_2	Belfast	6
Crumlin_2_Belfast	Belfast	7
Falls_1	Belfast	8
Ardoyne_3	Belfast	9
Creggan Central_1	Derry	10
Upper Springfield_3	Belfast	11
East	Strabane	12
Clonard_1	Belfast	13
New Lodge_2	Belfast	14
New Lodge_3	Belfast	15
Collin Glen_3	Lisburn	16
Twinbrook_2	Lisburn	17
Shankill_1	Belfast	18
Duncairn_1	Belfast	19
Upper Springfield_1	Belfast	20
Water Works_1	Belfast	21
Crumlin_1_Belfast	Belfast	22
Ballymacarrett_3	Belfast	23
Whiterock_1	Belfast	24
Shantallow West_2	Derry	25

3.6. This pattern is further replicated upon examination of the deprivation domain which specifically relates to employment<sup>6</sup>, with 16 out of the most deprived 25 areas being in Belfast (**TABLE 2**).

**TABLE 2:** NINIS Employment Deprivation 2010: 25 Most Deprived Super Output Areas

Whiterock_2	Belfast	1
Whiterock_3	Belfast	2
Upper Springfield_3	Belfast	3
Falls_2	Belfast	4
Crumlin_2_Belfast	Belfast	5
Creggan Central_1	Derry	6
East	Strabane	7
New Lodge_1	Belfast	8
Strand_1_Derry	Derry	9
Falls_3	Belfast	10
Whiterock_1	Belfast	11
Falls_1	Belfast	12

<sup>6</sup> According to NINIS, the employment score measures the proportion of the working age population living in households in receipt of an employment related benefit. i.e. unemployment claimant count, incapacity benefit, severe disablement allowance, carer's allowance, employment and support allowance or steps to work/new deal participants.

Shankill_2	Belfast	13
The Diamond	Derry	14
Clonard_1	Belfast	15
Upper Springfield_1	Belfast	16
New Lodge_2	Belfast	17
Twinbrook_2	Lisburn	18
Westland	Derry	19
New Lodge_3	Belfast	20
Ardoyne_3	Belfast	21
Shantallow East	Derry	22
Drumnamoe_1	Craigavon	23
Clondermot_1	Derry	24
Water Works_1	Belfast	25

3.7. Specifically, PPR note the wealth of evidence available regarding long term unemployment as both collected in data relating to Job Seekers Allowance Claimant Count as well as in the Labour Force Survey. PPR also note government collected data relating to those who are economically inactive which is also measured in the Labour Force Survey and in information regarding the Employment Support Allowance Claimant Count. This data which is discussed in greater detail later in this response, pinpoints specific groups experiencing greatest inequality in these areas and should be at the forefront of this policy's development.

3.8. Whilst the latter part of this submission comments specifically on the draft Equality Screening document which is supplied alongside the draft policy for consultation, it should be noted at the outset that **PPR are extremely concerned by the failure to consider this data. Data is collected by government bodies so that it can be used to develop more targeted policies and programmes and, in turn, provide better outcomes for those in most need in our society.**

3.9. **Failure to use this data prevents Council from considering the impact of this policy on groups experiencing inequality and, most importantly, developing measures to promote equality.**

3.10. **By failing to even consider such data leaves the Council's duties under Section 75 of the Northern Ireland Act 1998 unfulfilled.**

## 4. Implementing REAL JOBS NOW!

4.1. PPR is amongst a significant number of organisations<sup>7</sup> with further concerns based principally on the details of the policy itself, about how it will ensure the implementation of the REAL JOBS NOW motion, particularly with regards to:

- 1....the use of the social clauses policy at every opportunity**
- 2....the application of the social clauses policy to all contracts with private companies;**
- 3....the use of employment weeks rather than ring-fenced jobs.**

These concerns, referred to in the #3SimpleSteps campaign, are explained more fully below.

### 4.2. REAL JOBS NOW! requires...

- 1.....social clauses to be included “at every opportunity” not just “wherever possible” or in contracts that are longer than six months and that have a labour value of over £250,000...**

4.3. The draft policy as presented to the Belfast City Council’s Strategic Policy and Resources Committee contains ambiguous language replete with ‘get-out’ clauses and indicates that staff should “*consider the opportunity*”, “*wherever possible*” to use “*appropriate social clauses*”.

4.4. This language is far from a commitment to include social clauses at **every** opportunity.

4.5. Belfast City Council’s commitment was to ensure the inclusion of a specific social clause (defined as guaranteed, ring fenced jobs for the long term unemployed). This requires strong and vigilant enforcement like the already existing Department for Culture Arts and Leisure contract conditions.

4.6. As such, the inclusion of strong social clauses should be the Council’s default position when developing contracts.

4.7. Should Belfast City Council find it necessary to depart from the default position (i.e. by choosing not to include a social clause) the decision should be fully justified, and the reasons explained and documented for the scrutiny of Councillors and the public.

### 4.8. REAL JOBS NOW! requires...

- 2....social clauses to be considered for inclusion in “all contracts” not just contracts of a certain type...**

4.9. Worryingly, the draft policy further specifies that only certain types of contracts are appropriate for this policy, by stating that “*straightforward supply contracts*” for example are

---

<sup>7</sup> Please see list of individuals and organisations who have called on Belfast City Council to ensure that the 3 Simple Steps are followed to amend the draft policy to ensure the implementation of the REAL JOBS NOW motion.

“unable to accommodate, skills training or employment opportunities”. As noted above, REAL JOBS NOW must be the default position of Council for every contract, there should be a presumption of inclusion in each contract from the beginning. If social clauses are not included, the onus should be on the Council to explain this position.

4.10. Belfast City Council has taken the lead by moving forward with the REAL JOBS NOW motion, the first initiative of its kind in Ireland. The policy for its implementation should be just as ambitious to deliver results. This approach is echoed in the learning from the DCAL Stadia Redevelopment Status Report;

*“Traditionally, Social Clauses were focussed only on large scale procurement initiatives and capital builds.*

*However, all contracts, regardless of size, scale and scope should be considered in terms of Social Clauses. It is only through this emphasis that a truly transformative approach can be taken to the delivering of benefits.”<sup>8</sup>*

#### **4.11. REAL JOBS NOW! requires...**

---

**3...social clauses which do exactly what they say on the tin - deliver “ring-fenced fully paid jobs & apprenticeships for the long term unemployed”; not ambiguous concepts such as employment weeks...**

---

4.12. At a meeting organised by Sinn Féin for the R2W Group with Council officials (13<sup>th</sup> June 2014), and at the request of Councillor Jim McVeigh, a commitment was made by Council officials to develop clearer terminology than ‘employment weeks’. This has not been done.

4.13. Furthermore, there is already an example in the model DCAL are using with the Stadia redevelopments which uses **jobs** not **employment weeks**. PPR are aware that Belfast City Council has stated that the use of ‘employment weeks’ gives protection against unscrupulous employers who would employ someone for a short period of time and count them as a ‘job’.

4.14. However, DCAL contracts have conditions which require recruitment of further long term unemployed people within a short period of time should one of the ring-fenced positions become vacated. This is stronger protection for long-term unemployed people and already happening in the public sector.

4.15. PPR have examined the number of employment weeks detailed in information supplied via Freedom of Information regarding the 11 contracts currently included in the Council’s Investment Programme– the total is 1257 weeks. Without knowing the duration of these contracts it’s hard to know what this would actually look like in reality. If you presumed, however that each contract lasted one year then giving one long term unemployed person a job for a year would represent 52 of these weeks. On that basis the 1257 weeks in these contracts would be the equivalent of giving **only 24 long term unemployed people a job for a year**. If we look at this from a value for money perspective it would mean that of the £150 investment package **only 1 ring-fenced position for the long term unemployed would be guaranteed for every £6.25m spent by council**.

4.16. In fact, the forthcoming redevelopment of Casement Park by DCAL will provide 73

---

<sup>8</sup> DCAL (April 2014) “Developing a Sustainable Economic Framework to Promote Equality: Status report on Social Clauses Strategy within the Department of Culture, Arts and Leisure”, Report No.1 p. 9

positions for the long term unemployed (46 jobs, 27 apprenticeships) which approximately amounts to 1 position per £1m.

4.17. It is important to note that the DCAL approach is acknowledged by DCAL itself as a minimum and so much more can be done:

*“The Department’s approach to Social Clauses is merely a beginning and a platform on which to build new minimum standards for progress. There are many areas for ongoing amendment and improvement, especially with regard to the full implementation, oversight and monitoring of advances in the Social Clauses agenda. DCAL has demonstrated bona fides in committing to reasonable but innovative efforts at applying existing policy and law. Other agencies and authorities must now do likewise.”<sup>9</sup>*

**4.18. It is therefore extremely concerning that Belfast City Council are effectively proposing lower standards than what is currently in operation in a government department.**

---

<sup>9</sup> DCAL (April 2014) “Developing a Sustainable Economic Framework to Promote Equality: Status report on Social Clauses Strategy within the Department of Culture, Arts and Leisure”, Report No.1 p. 5-6

## 5. Additional Concerns with the Draft Policy...

### 5.1. ...using social clauses to generate outcomes for the unemployed is not new – there is existing best practice...

5.1.1. The Executive Summary of the draft policy emphasises the perceived infancy of social clauses and notes that despite legislation which came into effect in 2012 allowing use of social clauses, there are still restrictions because of EU rules and wider procurement practice. **It should be stated clearly however, that the use of social clauses in procurement is not new at all**, in fact there is already plenty of expertise in the public sector about how to use social clauses well.

#### 5.1.2. CASE STUDY 1: Department for Finance & Personnel Pilot (2003)

In 2003 the Department of Finance and Personnel commenced a cross- Departmental pilot project on utilising the unemployed in public sector procurement. Companies bidding for 15 public sector construction and service contracts had to submit employment plans outlining how they intended to employ the unemployed in work on the contract, as well as any previous experience doing this type of work. Importantly, this contractual obligation to employ the unemployed also applied to any work carried out by sub-contractors on the contract. The employment plan also determined that if two bids were judged to be equal then whichever had the better employment plan would get the tender.

During a two-year period, 51 people commenced employment on various contracts involved in the pilot project, and as of June 2005, 46 were still in employment i.e. two years after the scheme commenced there was a 90% employment retention rate. The formal evaluation of the project carried out by the University of Ulster academics concluded that it was a resounding success. It was legal, economic, efficient and effective. In fact, the evaluation stated that if rolled out across the public sector, using social clauses to ring-fence jobs for the long term unemployed could *“make a significant impact to reducing unemployment and social welfare payments”*.

#### 5.1.3 CASE STUDY 2: Department for Culture, Arts & Leisure, Ravenhill Stadium (2012)

In 2012, the Department for Culture, Arts and Leisure utilised a £15m expenditure on Ravenhill Rugby stadium to create 7 fully paid jobs and 4 fully paid apprenticeships for the long-term unemployed (12+ months). Work on this project has been completed, however no evaluation has been carried out to date. Nevertheless, the relevant contract language and clauses required to implement these constructive measures are available. It is also our understanding that DCAL were seeking to enhance the basic conditions in the Ravenhill contracts through both the Windsor Park and Casement Stadium projects.

5.1.4 These best practice initiatives strongly influenced the development of the REAL JOBS NOW motion.

5.1.5. Furthermore, with specific regards to the suggested limitations imposed by EU rules, it would be helpful if Council in noting the limitations of existing legislation could also note the positive obligations the policy ought to be guided by. Section 75 of the Northern Ireland Act 1998 and Article 75(1) of the Fair Employment and Treatment (NI) Order for example

both provide a framework for the development of social clauses which produce real outcomes for the unemployed.<sup>10</sup>

5.1.6. Despite the consultation referring to the draft policy as being the same document which was presented to Council's Strategic Policy & Resources Committee, PPR note important differences.

## **5.2....the change in the intended target group...**

5.2.1. PPR note the reference to social clauses being targeted not just at the long term unemployed, but also at *“young people, women, people who have a disability, minority ethnics etc”*.

5.2.2. PPR welcome the inclusion of named Section 75 groups as intended beneficiaries of the Council's job creation. However, it is not clear if these groups have been included as Council has identified that they experience long term unemployment under the terms of the current definition or for another reason. The current ILO (International Labour Organisation) definition requires that a person be out of work, want a job, have actively been searching for a job within the last four weeks and be available to start within the next two weeks.<sup>11</sup> **PPR would respectfully request that Belfast City Council supply the data and equality impact assessment which led to the inclusion of these groups.**<sup>12</sup>

5.2.3. It is noted that economic inactivity is mentioned, but if it is Council's intention to tackle both long term unemployment and worklessness in the form of economic inactivity, this should be explicitly stated. Economic inactivity should be distinguished from long term unemployment with care taken to ensure the two terms are not inappropriately conflated as available evidence identifies different Section 75(1) groups impacted in each area. In terms of gender for example, information deduced from data collected on Job Seekers Allowance Claimants provides that men are more likely to be impacted by long term unemployment; whilst data on Employment Support Allowance claimants supports the assertion that women are more likely to be economically inactive.

5.2.4. Additionally, in terms of economic inactivity this should be included only in the case of people who want to work but cannot work. This is important as this is where female worklessness mostly manifests itself. **PPR respectfully request that Council provide information as to what provisions have been made in the inclusion of social clauses for people who are economically inactive but want to work?** For example, have Council included childcare clauses, flexible working clauses etc? It is essential that Council ensure that the Social Clauses policy is not used as a further trigger to inappropriately force economically inactive people into environments which will be to their further personal detriment.

---

<sup>10</sup> For further, please see e.g. DCAL (April 2014) “Developing a Sustainable Economic Framework to Promote Equality: Status report on Social Clauses Strategy within the Department of Culture, Arts and Leisure”, Report No.1 p.3

<sup>11</sup> Definition of unemployed taken from standard used by the International Labour Organisation (ILO)

<sup>12</sup> It is presumed that this is different from the equality screening exercise carried out on this draft policy, in which no such inequality is observed.

### **5.3...the proposals for the monitoring of social clauses...**

5.3.1. Critically, the guidance note on how to implement and monitor social clauses which is referred to, is not included in the documents for consultation. Without viewing this information, it is difficult to ascertain if key processes are being followed. Only when social clauses are monitored effectively can change be delivered on the ground. **PPR respectfully requests a copy of this guidance note.**

5.3.2. **PPR also wish to underline that a monitoring template agreed for use at the Girdwood Social Clause Group meetings and prepared by PPR has not yet been used.** This template was designed to be submitted by the contractor on a quarterly basis and enable members of the Group to monitor the implementation of the social clauses and identify good practice, challenges and problems.

5.3.3. The draft policy further notes:

*“to ensure the use of social clauses is effective and delivering the desired outcomes, clauses need to be monitored and reported.”*

5.3.4. Despite this, however, a number of vague references to monitoring requirements are referred to. For example, the draft policy also states that; *“Consideration needs to be given to how non compliance will be addressed”* (p.6) and refers to further details on the monitoring of social clauses as being *“included in the accompanying guidance for officers”*.

### **5.4....the enforcement of social clauses...**

5.4.1. Enforcement of social clauses must be treated as a tie breaker in the specification and non-compliance should be approached as a breach of contract.

5.4.2. In the absence of the accompanying guidance referred to, comments can only be made on the information presented in the draft policy. In this regard, note should be taken of the critical nature of both monitoring and ensuring compliance, **it is therefore inappropriate for Council to take the position that non-compliance will be considered (presumably at a later date) outside of the current policy development consultation exercise.**

5.4.3. Council must consider the existing best practice available in this regard from the DCAL Stadia Projects. Specifically with reference to the tender documentation from such projects as the Ravenhill Development, it is clear that failure to deliver opportunities for the long term unemployed would be considered as a breach of contract. Given that monitoring for compliance is the primary evidence base upon which outcomes are measured, it can be considered that failure to appropriately monitor compliance could therefore be considered a breach of contract. Document 3 of 5 of the Works Information Volume 3A of the Ravenhill Stadium tender states in relation to the delivery of outcomes for the long term unemployed, apprentices and students that;

*“Notwithstanding the requirement as detailed elsewhere for these activities to be defined in the Activity Schedule and the associated requirement for them to be complete in order for associated payment to be facilitated under the terms of the NEC Building Contract, the Employer reserves the right, in consultation with the*

*Funding Department, to consider the non-delivery of these requirements as a breach of contract” (DCAL p.69)*

5.4.4. Similar vagueness is noted in the ‘key points to remember’ section of draft policy which contains the following advice:

*“Don’t include social clauses in the evaluation criteria, when included they should be a non-optional part of the specification.”*

5.4.5. It is unclear how social clauses could be a ‘non-optional’ i.e. compulsory element of the tender specification yet not be included in the evaluation criteria. **In the Department for Finance and Personnel 2003 Pilot, social clauses were not only be weighted, they were considered a tie breaker – Belfast City Council must adopt similarly robust standards for effective implementation.**

### **5.5...the role of the Contractor in discharging equality duties...**

5.5.1. In the example social clauses contained within Appendix 2 of the consultation, the model contract provisions regarding monitoring and equality of opportunity include stipulations such as:

*“The Contractor shall take all reasonable steps to ensure the observance of the provisions of the above clause” and “The Contractor provides:- An update at monthly meetings that meets the section 75 requirements for equality, good relations and disability monitoring.”*

5.5.2. This is insufficient for the reasons outlined below.

5.5.3. Firstly, an insistence that the Contractor “take all reasonable steps” is not the same as an insistence that the Contractor is required to ensure the clauses are observed. Again, with reference to existing best practice in using procurement to meet Section 75 obligations, DCAL’s Economic Framework to Promote Equality in the Stadia Development notes that a specific requirement to discharge the Section 75 duties is emphasised in the standard template issued to contractors. Noting this, the Economic Framework notes that;

*“First, it requires that the contractor, in furtherance of receipt of public funding, is required to partake in the discharge of DCAL’s statutory equality obligations (as the contracting authority). Second, the contractual onus to target opportunities must take place on the basis of DCAL using s.75 to designate the relevant sectors in the relevant areas.”<sup>13</sup>*

5.5.4. Social requirements listed in the example social clauses in Appendix 2 also contain provisions which may give rise to concern. Appendix 2 contains new example language relating to capacity building opportunities for disadvantaged and underrepresented groups. Specifically, the example given states;

*“In discussion with BCC and DEL, the contractor may need to provide capacity building opportunities for the disadvantaged and underrepresented groups. For*

---

<sup>13</sup> DCAL (April 2014) “Developing a Sustainable Economic Framework to Promote Equality: Status report on Social Clauses Strategy within the Department of Culture, Arts and Leisure”, Report No.1 p. 10

*example, recruitment workshops and events targeted at these groups. Where possible locations that are accessible, neutral or shared spaces will be used for these activities.”*

5.5.5. PPR's work has provided important learning about the nature of participation and capacity building; core to this has been that barriers to access services are not limited to geographic location. Rather, barriers are often of a deeply practical nature and are only identified through the involvement of the affected group themselves. This draft policy should consider capacity building as critical to the successful implementation of targeted social clauses, but it must ensure that this is done seriously. Potential barriers could also include, for example, when the workshops will be held - will recruitment workshops aimed at economically inactive (mostly women) be held during the hours when children are at school for example?

5.5.6. Members of the Right to Work: Right to Welfare Group whose campaign for REAL JOBS NOW attracted cross party support at Council, recently attended an employment information day at Girdwood Park. Feedback from group members who attended identified that their attempts at meaningful participation was frustrated because of lack of information available.

5.5.7. PPR have also been made aware of difficulties the long term unemployed have had in trying to access employment opportunities through the Girdwood redevelopment. Despite being called for interview for a position which required the use of a forklift, applicants could only obtain a forklift license through local training providers on receipt of an offer of employment from the Contractor. The Contractor however was unable to provide such an offer without proof of a forklift license.

## 6. Equality Screening

6.1. As identified at the outset, PPR are deeply concerned by both the failure to meaningfully consider relevant data and the subsequent failure to conduct a full Equality Impact Assessment on this draft policy. It is essential that Belfast City Council correct this position before progressing this policy further if the current large scale Investment Programme is to create meaningful outcomes for the city's long term unemployed.

6.2. Despite the long term unemployed being identified as impacted by this policy in the equality screening exercise (pp.16) there is little analysis beyond this. Instead there is frequent use of the following phrase in relation to consideration of available evidence by Section 75(1) grouping;

*"This is a new activity and so no specific evidence exists for the council to use."*

6.3. Belfast City Council's examination of available evidence by Section 75(1) grouping in this equality screening exercise is limited largely to population profiles taken from the 2011 Census. Only minor reference is made to economic inactivity or unemployment.

6.4. Despite the lack of evidence considered by Council, government Departments collect and often publish data relevant to this policy, which is broken down in many cases by several Section 75 (1) categories.

6.5. PPR view data relating to both long term unemployment and economic inactivity as particularly important and in the following table we examine the data we are aware of which is collected. Copies of this data, previously supplied to PPR by DCAL is included as an Appendix to this consultation response. **It is to be assumed that up to date data of this nature can be readily retrieved by Belfast City Council.**

**6.6. TABLE 3:** Long Term Unemployment (LTU)

Section 75 Category	LTU Data available?	Source(s)
Gender	Yes	Claimant Count (August 2012) (Data released by DSD to DCAL) & Labour Force Survey (2011) (NISRA)
Age	Yes	Claimant Count (August 2012) (Data released by DSD to DCAL) & Labour Force Survey (2011) (NISRA)
Religion	Yes	Labour Force Survey (2011) (OFMDFM)
Disability Status	Yes	Labour Force Survey (2011) (NISRA)
Dependent Status	Yes	Labour Force Survey (2011) (NISRA)
Political Opinion		
Marital Status	Yes	Claimant Count (August 2012) (Data released by DSD to DCAL) & Labour Force Survey (2011) (NISRA)
Race		
Sexual Orientation		

**6.7. TABLE 4:** Economic Inactivity

<b>Section 75 Category</b>	<b>Economically Inactive Data available?</b>	<b>Source(s)</b>
Gender	<b>Yes</b>	Employment Support Allowance Work Related Activity Group over 12 months by gender as at August 2012 (released by DSD) & Labour Force Survey (2011) (NISRA)
Age	<b>Yes</b>	Employment Support Allowance Work Related Activity Group over 12 months by age as at August 2012 (released by DSD) & Labour Force Survey (2011) (NISRA)
Religion	<b>Yes</b>	Labour Force Survey (2011) (OFMDFM)
Disability Status	<b>Yes</b>	Labour Force Survey (2011) (NISRA)
Dependent Status	<b>Yes</b>	Employment Support Allowance Work Related Activity Group over 12 months by dependent status as at August 2012 (supplied by DSD) & Labour Force Survey (2011) (NISRA)
Political Opinion		
Marital Status	<b>Yes</b>	Labour Force Survey (2011) (NISRA)
Race		
Sexual Orientation		

**6.8. That this data is collected and available underlines the onus on Belfast City Council to consider it fully in ascertaining the potential impacts of their policy and in ensuring that its obligations under Section 75(1) are fully discharged. It is equally critical that this data is considered to ensure that outcomes for the most in need, in this case jobs for the long term unemployed, result. Only when inequalities are named can they be tackled.**

6.9. Belfast City Council must further ensure that the information is up to date and appropriate, as the information supplied here may not be the most current information available.

6.9.1. From PPR's analysis of the evidence however, it is clear that the groups most impacted by this policy are;

- the long term unemployed; particularly those who are Catholic, Male and aged between 25-44
- the economically inactive; particularly those who are Female and married.

6.9.2. Further consideration should be given to additional inequalities identified which may assist in ensuring those impacted are targeted in this policy.

6.9.3. As a result of the striking failure by Belfast City Council to appropriately consider the available data relevant to this policy, some of which is referred to here, **PPR strongly insist**

**that a full Equality Impact Assessment is carried out on the revised policy before any further steps towards implementation are taken.**

6.9.4. For further enquiries regarding this response and to supply further information regarding information requested throughout, please contact Kate Ward, Policy and Research Support Officer, by email on [kate@pprproject.org](mailto:kate@pprproject.org)

**Appendix 1:** Sample of organisations in support of the #3SimpleSteps campaign for full implementation of the REAL JOBS NOW motion

EPIC Loyalists Ex-Prisoners Group
Glór Na Móna:
Cliftonville Community Regeneration Forum
174 Trust
East Belfast Independent Advice Centre
Laochra Loch Lao CLG GAA club
Evan Bates: Formerly of West Belfast and Greater Shankill Health Employment Partnership
Forbairt Feirste
Lower Shankill Community Association
The Golden Thread Art Gallery
Fóram Na nÓg
Short Strand Community Forum
Tar Isteach – Republican ex prisoners group
The Frank Gillen Centre
The Red Barn Art Gallery
The Blackie River Community Group
The Roden Street Community Development Group
The Markets Development Association
Laochra Loch Lao CLG
Campa Chormac Co. Aontroma
Dr Thomas Donnelly, Bsc, MBChB. MRCS. Registrar in trauma and orthopaedics.
Unite Jordanstown
Centre for global education
Terry Enright Foundation
Upper Springfield Development Trust
Job assist West Belfast
Job Assist North Belfast
Trademark NI
Star Neighbourhood centre
Include Youth
Clonard Monastery Youth Centre
Churches Community Work Alliance
Conradh Na Gaeilge
Lenadoon Community Forum
Glen parent youth group

**Appendix 2:** Copies of data previously supplied to PPR in relation to the experiences of Section 75 groups facing unemployment and economic inactivity.

### 1. Long Term Unemployment (Age)

#### Job Seekers Allowance Claimants over 12 months by age as at August 2012

Age group	Duration of claim		
	12-23 months LTU	24-35 months LTU	36+ months LTU
18-24	17.9%	14.1%	5.1%
25-34	29.6%	24.4%	20.2%
35-44	23.5%	25.2%	26.4%
45-49	11.6%	15.2%	17.3%
50-54	9.2%	10.1%	14.5%
55-59	6.4%	8.1%	12.3%
60-64	1.8%	3.0%	4.3%
Total	100.0%	100.0%	100.0%

Source Department of Social Development

Data extracted August 2012

#### Labour Force Survey, 2011

Gender	LTU
16-24	31%
25-34	26%
35-49	25%
50-64	*
Total	100%

Source: Labour Force Survey, NISRA

\* sample size too small for a reliable estimate

### 2. Long Term Unemployment (Gender)

#### Job Seekers Allowance Claimants over 12 months by gender as at August 2012

Gender	Duration of claim		
	12-23 months LTU	24-35 months LTU	36+ months LTU

Female	29.2%	25.7%	15.9%
Male	70.8%	74.4%	84.1%
Total	100.0%	100.0%	100.0%

Source: Department of Social Development

Data extracted August 2012

### Labour Force Survey, 2011

Gender	LTU
Female	*
Male	82%
Total	100%

Source: Labour Force Survey, NISRA

\* sample size too small for a reliable estimate

### 3. Long Term Unemployment (Marital status)

#### Job Seekers Allowance Claimants over 12 months by marital status as at August 2012

Gender	Duration of claim		
	12-23 months LTU	24-35 months LTU	36+ months LTU
Not known	0.3%	0.3%	0.3%
Single	68.2%	64.6%	57.1%
Married	9.8%	10.5%	18.6%
Widowed	0.9%	1.1%	1.5%
Divorced	6.4%	8.5%	7.7%
Separated	12.0%	12.2%	11.8%
Cohabiting	2.5%	2.9%	3.1%
Total	100.0%	100.0%	100.0%

Source Department of Social Development

Data extracted August 2012

### Labour Force Survey, 2011

Marital Status	LTU
----------------	-----

<b>Single</b>	<b>72%</b>
<b>Married</b>	<b>28%</b>
<b>Total</b>	<b>100%</b>

Source: Labour Force Survey, NISRA

#### **4. Long Term Unemployment (Disability status)**

Labour Force Survey, 2011

<b>Disability Status</b>	<b>LTU</b>
<b>Disabled</b>	<b>19%</b>
<b>Not disabled</b>	<b>81%</b>
<b>Total</b>	<b>100%</b>

Source: Labour Force Survey, NISRA

#### **5. Long Term Unemployment (Dependants)**

Labour Force Survey, 2011

<b>Dependants Status</b>	<b>LTU</b>
<b>Parent</b>	<b>44%</b>
<b>Not a Parent</b>	<b>56%</b>
<b>Total</b>	<b>100%</b>

Source: Labour Force Survey, NISRA

\* the analysis of 'dependants' is for parents only, aged 16-64, and is based on head or partner of the head of family only

## 6. Long Term Unemployment (Religious background)

Labour Force Survey, 2011

Religion	LTU
Protestant	39%
<b>Catholic</b>	<b>61%</b>
Total	100%

Source: Labour Force Survey, OFMDFM

## 7. Economic Inactivity (Age)

Employment Support Allowance Work Related Activity Group over 12 months by age as at August 2012

Age group	Duration of claim		
	12-23 months	24-35 months	36+ months
Under 18	0.0%	0.0%	0.0%
18-24	9.7%	9.2%	5.9%
25-34	14.2%	12.7%	10.6%
35-44	24.3%	22.1%	18.9%
<b>45-54</b>	<b>30.6%</b>	<b>32.5%</b>	<b>35.3%</b>
55-59	12.2%	14.9%	16.8%
60+	8.9%	8.6%	12.4%
Total	100.0%	100.0%	100.0%

Source Department of Social Development

Data extracted August 2012

Labour Force Survey, 2011

Economically Inactive	
Gender	8%
16-24	14%
25-34	20%

<b>35-44</b>	<b>26%</b>
<b>45-54</b>	<b>27%</b>
<b>55-64</b>	<b>5%</b>
<b>65 and over</b>	<b>100%</b>
<b>Total</b>	

Source: Labour Force Survey, NISRA

## 8. Economic Inactivity (Gender)

### Employment Support Allowance Work Related Activity Group over 12 months by gender as at August 2012

Gender	Duration of claim		
	12-23 months	24-35 months	36+ months
<b>Female</b>	<b>50.7%</b>	<b>51.2%</b>	<b>53.7%</b>
<b>Male</b>	<b>49.3%</b>	<b>48.8%</b>	<b>46.3%</b>
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Source: Department of Social Development

Data extracted August 2012

### Labour Force Survey, 2011

Gender	Economically Inactive
<b>Female</b>	<b>65%</b>
<b>Male</b>	<b>35%</b>

<b>Total</b>	100%
--------------	------

Source: Labour Force Survey, NISRA

### 9. Economic Inactivity (Marital status)

Labour Force Survey, 2011

Marital Status	Economically Inactive
Single, never married	34%
<b>Married, living with husband/wife</b>	<b>47%</b>
Married, separated from husband/wife	7%
Divorced	9%
Widowed	*
Civil Partner	*
<b>Total</b>	<b>100%</b>

Source: Labour Force Survey, NISRA

\* sample size too small for a reliable estimate

### 10. Economic Inactivity (Disability status)

Labour Force Survey, 2011

Disability Status	Economically Inactive
<b>Disabled</b>	<b>63%</b>
Not disabled	37%
<b>Total</b>	<b>100%</b>

Source: Labour Force Survey, NISRA

## 11. Economic Inactivity (Dependent status)

### Employment Support Allowance Work Related Activity Group over 12 months by dependent status as at August 2012

Dependant Status	Duration of claim		
	12-23 months	24-35 months	36+ months
Dependent Children	26.0%	24.1%	23.3%
<b>No Dependent Children</b>	<b>74.0%</b>	<b>75.9%</b>	<b>76.7%</b>
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Source: Department of Social Development  
Data extracted August 2012

Dependants Status	Economically Inactive
Parent	44%
Not a Parent	56%
<b>Total</b>	<b>100%</b>

Source: Labour Force Survey, NISRA

\* the analysis of 'dependants' is for parents only, aged 16-64, and is based on head or partner of the head of family only

## 12. Economic Inactivity (Religious background)

Labour Force Survey,  
2011

Religion	Economically Inactive
Protestant	56%
Catholic	44%
<b>Total</b>	<b>100%</b>

Source: Labour Force Survey,  
OFMDFM