



# Cabinet Member Report

<b>Decision Maker:</b>	Cabinet Member for Housing, Regeneration, Business and Economic Development
<b>Date:</b>	12 <sup>th</sup> December 2016
<b>Classification:</b>	General Release
<b>Title:</b>	Westminster Employment Service
<b>Wards Affected:</b>	All
<b>City for All</b>	The Council's ambition is to work with partners to reduce long term unemployment through a new Westminster Employment Service.
<b>Key Decision:</b>	No
<b>Financial Summary:</b>	<p>The Westminster Employment Service will be self-funding. There is no proposed draw on the Council's General Fund. Income will come from a range of discretionary and external funds.</p> <p>Achievable profiled income is set out in the cash flow presented in this report. All services will contain long term agreements, with built in break clauses</p>
<b>Report of:</b>	Ed Watson, Executive Director of Growth, Planning & Housing <a href="mailto:ewatson@westminster.gov.uk">ewatson@westminster.gov.uk</a>

## 1. **Executive Summary**

- 1.1 This report sets out the business case, including the preferred option, for the new Westminster Employment Service (WES); a City for All Commitment to reduce long term unemployment. The proposal follows wide ranging consultation from across all council service areas, local charities, further education colleges, expert practitioners, Scrutiny Committee and through Cabinet Member briefings.
- 1.2 To advance the City for All ambition, the new Service will offer an enhanced customer experience to residents and employers. Over the first 4 years the ambition is to deliver 2,000 jobs for long term unemployed residents. This will be the largest single programme of its type operating in Westminster. This support will come at a time when mainstream support is being reduced significantly.
- 1.3 The service will be self-funding and support wider savings to the local authority through reducing downstream demand on health and adults services. Moreover the Service will harness the Council's unique convening power across the borough, working across agencies to reduce long term unemployment.

## 2. **Recommendations**

- 2.1 The Cabinet Member is asked to:
  - i. **Approve** the operational model and plans.
  - ii. **Agree** that income for the Service will come through utilising discretionary funding and identifying new income streams.
  - iii. **Approve** the outline cash-flow projections up to 2021 and the proposals for budget management set out at Section 10 below.

## 3. **Reasons for Decision**

- 3.1 There is in fact already good provision for people who have low and moderate needs for support. The vast majority of this cohort returns to work within six months, either by themselves or with the assistance of Jobcentre Plus. However for those who are out of work because of ill health: particularly anxiety, depression or low level mental health conditions, there is much less success at returning to work or, indeed, finding work in the first place. Those with the highest level of need typically claim Employment Support Allowance (ESA) and are the largest single group of long term unemployed in the City. Eighty four per cent of claimants are in receipt of ESA benefits.
- 3.2 Reducing long term unemployment is therefore very challenging. Historic data reflects this. In Westminster only 8% of ESA claimants have found sustained work through the National Work Programme. Going forward, this will be exacerbated because there is

unlikely to be sufficient specific support for the long-term unemployed through mainstream government programmes. The new Work and Health Programme itself will reduce to around 25% the size of the outgoing Work Programme.<sup>1</sup>

- 3.3 There is opportunity and perhaps a necessity for the City Council, at low or no direct cost to the authority, to fill the gaps in provision and work with local agencies and charities to deliver year on year increases in the number of residents supported into employment.
- 3.4 The council itself has limited resources to fund programmes. However, in mitigation, the authority could profile the management of anticipated income over a four to five year period rather than the typical 12-18 month cycle. This was identified during the consultation exercise as a significant constraint to effective delivery. Planning for the longer term can alleviate at least some financial constraints.
- 3.5 Other benefits of the new service include:
- *A clear understanding of the needs of customers* through introducing a standardised set of questions across Council front line staff. This will ensure residents are directed to the right service first time.
  - *Improving the targeting of unemployed residents.* The proposal is to prioritise support for residents, based on a balance of employment outcomes and cost avoidance, but also to address known gaps in provision for particular groups.
  - *Using data and IT more effectively to measure the success of council interventions.* A new web based offer will be developed for those with lower levels of need.
  - *Joining up the Westminster Employment Service with other planned provision.* The Employment Team will be involved in the design and delivery of the new Work & Health Programme and European Social Fund projects. The team will also work with all of the key partners and agencies in the City to seek their support for the Service and to define a new more collaborative approach.
  - *Supporting the Council's Medium Term Planning and Savings agendas* through establishing a robust evaluation framework to assess return on investment, savings and, where possible, illustrate where the service is reducing demand downstream; for example through health and social care services.

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<sup>1</sup> The Council's analysis is that the future programme will contribute around 54 job outcomes for Westminster residents annually, based on indicative volumes released by DWP.

## 4. Background

### Business case for the Westminster Employment Service

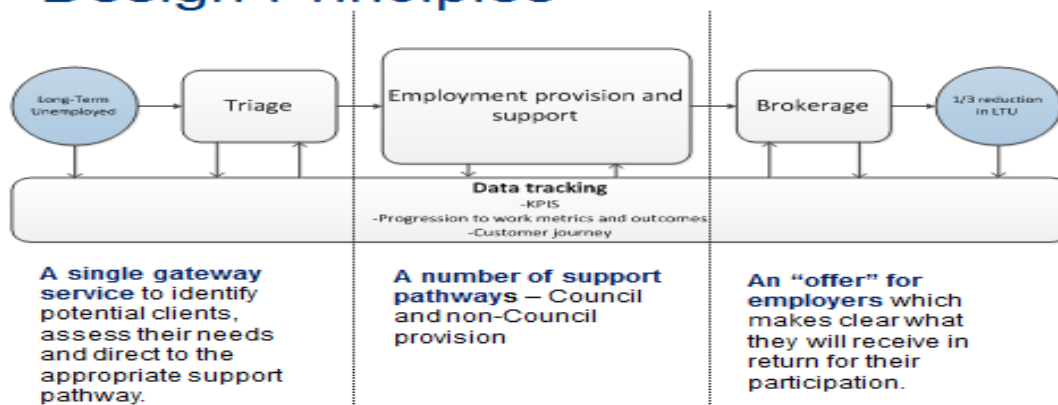
4.1 Background information is set out in the business case Annex 1. The following briefly describes the contents of this document:

- *Purpose* - includes the vision for the Westminster Employment Service and its investment objectives. (Page 4)
- *Strategic Context* - the fit with City for All, Public Service Reform and Health and Wellbeing agendas, effective integration with the council estates programme and the “one front door” approach (Pages 4)
- *Case for Change* - the rationale for a new service, who it should help and why; the components of an integrated service, future demands and what is known about the effectiveness of national employment support provision (Pages 7)
- *Available options & the preferred option* - how the shortlist of options emerged, the critical success factors, design principles, pros and cons of each option and the preferred option (Pages 12-19)
- *Procurement option* - how income will support outcomes including through Council advisors and brokers (Page 20)
- *Funding & affordability* - a cash flow profile for the first five years is set out. The unit costs of interventions are set out in the appendices. (Page 20-23)
- *Management arrangements* - the proposed team is drawn from across Council services (Page 24)
- *Appendices* - more detailed information including research findings and a summary of what works in reducing long term unemployment (Appendix 2)

## 5. Design principles and the preferred option

### Design principles

## Design Principles



- 5.1 Following wide ranging consultation a number of the design principles have emerged for the service. The model is illustrated above and includes:
- 5.2 A **single gateway service** which identifies potential clients, assesses needs and directs support, will be introduced across frontline services in an initial basic first stage triage. A detailed second stage triage will then follow to ensure residents are directed to the right service, the first time. This second stage will involve a team with a detailed knowledge of the available internal and external support services.
- 5.3 **Employment provision and support** refers clients through to a new digital service, signposts to other non-employment services or refers clients to employment advisors. This could include the Council's in house employment team or, external provision, including services commissioned by Central London Forward or through the European Social Fund. The Council will co-commission employment support. It will also look to sustain its current advisor team using external and discretionary funding.
- 5.4 **Job brokerage** & in work support is a single interface with local employers designed to cater for all work related opportunities, including apprenticeship advice, supported employment and work placements. The 'ask' to employers will also change to reflect a wide range of ways in which employers can support long term unemployed cohorts. For instance, providers have identified the need for an expanded work trials programme. It is foreseen that this will be incorporated into the brokerage function. The brokerage service will also work closely with advisors who have the trusted relationships with the client.
- 5.5 An online portal for brokerage and job advertising will be developed. The portal builds on the success of the Council's microsite, developed recently with and for Young People. The site currently receives over 20,000 page views per quarter.
- 5.6 Accurate **data tracking** will ensure continuous improvement and evaluation. This in turn will make new investment more effective. The Council will use an expert panel to continuously peer review the service and, where necessary, will commission independent evaluation.

5.7 Feedback received during consultation on the model is set out at section 9 below.

## **6. Beneficiaries**

6.1 The Westminster Employment Service will focus on support for unemployed people claiming benefit for over one year (this was the Council's original criterion in developing the City for All target).

6.2 Taking this definition a step further, a recent cost benefit analysis identified cohorts where there is the greatest scope for a combination of unemployment and cost avoidance. These cohorts are 1) residents in temporary accommodation, 2) with children, 3) known to social services, 4) troubled families, with 5) physical disabilities and 6) supported accommodation.

6.3 Over the first four years of the service, the working target is for 70% of beneficiaries to be long term unemployed and in receipt of benefits whilst it is anticipated the remaining 30% will come from other groups. The latter groups could include Westminster claimants who are less than one year unemployed and those not in receipt of DWP benefits but are out of work, and who risk long term unemployment. Examples include carers working with elderly, isolated residents or young people Not in Education, Employment or Education (NEET).

## **7 The preferred option**

7.1 Establishing a local framework with an on-going role in delivering employment support is the option which best responds to extensive analysis and consultation. In spite of a reduction in Government provision, the Service will enable the Council to support increased numbers of residents off benefits and into work. The preferred option also offers value for money because it harnesses discretionary and external funding. The City Council has a strong track-record in this area.

7.2 If additional income is secured, the Council may consider increasing internal advisor support and or commissioning additional capacity from local agencies.

7.3 The Council will commission external provision through a tri-borough employment programme. The programme will prioritise adults with disabilities and health conditions. Following a successful partnership bid for European Funding, a new service for residents in Temporary Accommodation will start in 2017. The Council is the overall lead partner for the project.

## 8 Performance

- 8.1 The Westminster Employment Service will provide support for between 2,000-2,500 residents per annum by bringing together internal and partner advisor teams and through more effective identification and triage. In the first two years, the service forecasts supporting over 1,400 jobs, of which 1,000 will be for long term unemployed residents.
- 8.2 Realistic targets for the period 2019-21 will be developed by 2018 when further information is known about funding for services and the nature of the demand from residents. The ambition is to sustain or increase provision and outcomes to achieve 2,000 jobs for long term unemployed residents through the service from 2017-2021.
- 8.3 Performance measures for the Service will include starts, interim measures, jobs and sustained jobs as defined in the table below. All performance measures are used by employment services and will allow the Service to be benchmarked with other initiatives.

<b>Starts</b>	Clients receiving a minimum of 6 hour support which could be advice and guidance.
<b>Interim measures</b>	Including volunteering and work placements
<b>Jobs</b>	A job is defined as <b>paid</b> full-time or part-time employment. Includes PAYE, self-employment, apprenticeship or paid internship. To note that depending on the hours of contract and personal circumstance, the resident <b>may not</b> need/be able to sign off claimed benefit.
<b>Sustained Jobs</b>	A sustained job is defined as remaining in employment for 3 months (for Income Support and Employment Support Allowance claimants) and 6 months for residents who claim Job seekers Allowance.

- 8.4 The profiled performance of the Service 2017-19 is set out below. Contributions to the performance of the Service will be through in house provision funded by the Council<sup>2</sup> as well as services such as Westminster Adult Education Service, which are funded directly by the government. Outcomes will also be recorded for programmes delivered by partners organisations funded by the Council as well as partners delivering in Westminster funded by other means; for instance charitable giving or the Big Lottery. The Service will include only the outcomes from partners willing to be part of the new Service and agreeing to a way of working with the Council, including sharing performance data.

### WES Forecast Performance 2017-2019

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<sup>2</sup> FACES, LEST, Tri-borough supported Employment, Church Street Advisors

April 2017-March 31 <sup>st</sup> 2019	Starts	Achieving job-starts	Of which, Long Term Unemployed
Council funded or delivered	4806	1349	944
Delivered by partners, not funded by WCC	653	241	169
<b>Forecast total (lower – upper projections)</b>	4094 - 5459	1193 - 1590	835 - 1113

- 8.5 Other performance measures to be introduced from 2017 will include off-flow rates to record clients that stop claiming benefits and a self-rating measure to record improved self-confidence, motivation to work and self-esteem; measured at pre-mid and post programme.
- 8.6 Continuous evaluation of the Service will track outcomes for priority cohorts including the groups which cost the council the most. By way of illustration, using figures from New Economy Manchester, endorsed by HM Treasury, the fiscal and economic benefits of a workless person entering employment are estimated at £9,000 per annum. If this formula is applied to Westminster and then the new Employment Service supports 700 residents per annum, annual savings to the Exchequer will be £6.3M, with a direct saving to the Local authority of £440,000. Evaluation of the service will provide a more accurate assessment of actuals and costs avoided.
- 8.7 However the following factors will impact on the performance of the Service during the first four years and will be modelled into projections and updated ongoing:

#### *Boosting performance*

- Additional advisor support through Council services and commissioned provision.
- Services and advisors within the Council working with partners as a single advisor team.
- Integrating skills and employment provision and the outputs of the Westminster Adult Education Service.
- A greater internal and external focus on the long term unemployed.

#### *Reducing performance*

- As tracking of individuals improves across agencies, the risk of double counting is significantly reduced.
- The assumption is that double counting, potential under performance across the contributing providers and uncertainty regarding future funding will reduce reported outcomes by between 15-25%.
- A worst case scenario of 25% reductions in reported numbers has already been factored into the figures presented above and is shown in the table above the lower forecast total.
- The new Health and Work Programme is anticipated to be 25% smaller than the current Work Programme.
- Uncertainty regarding WAES' funding from the Skills Funding Agency and GLA following the anticipated devolution of adult skills budgets from 2018.



- External programmes, for instance European Social Fund projects, deliver in Westminster but commissioned by other organisations may experience delays leading to delivery time lags.

8.8 Finally, it is anticipated that the WES will support at least five times more long term unemployed residents per annum than through Working Capital and the new Work & Health Programme combined<sup>3</sup>. The service will be the largest single programme to support residents with health conditions and the long term unemployed to find work.

## 9 Progress to date

- 9.1 The Council has already developed an integrated team of 12 advisors from across separate departments. These advisors focus on supporting long term unemployed residents. This is beginning to yield results. In the first six months of this year, 499 residents have been supported into employment. Of those, 355 were previously long term unemployed, claiming benefits for 12 months or more. Outcomes for Long Term Unemployed residents in 2016/17 are projected to increase by 158%, compared with 2015/16.<sup>4</sup>
- 9.2 A £1m Employment Fund has been set up. An additional £750,000 of external funding has been secured to support residents in Temporary Accommodation. Meanwhile all services funded by the Council, including Recruit London, have been set targets for 70% to support long term unemployed clients into work.
- 9.3 An Advisor Academy has been established to provide training and development for employment advisors across Westminster's partners. A new triage approach is being tested through the Council's in house employment advisors.
- 9.4 From October 2016 to March 2017, further services are to be developed including an online triage, a new web offer, a consolidated brokerage offer and the Childcare Academy initiative funded by Public Health.
- 9.5 A further ambition this year is to persuade all external partners to sign up to a pledge to reduce long term unemployment and for these same services to set out the detail of how they will contribute to the council's ambition. Through the Westminster Employment Service, the council will be better able to identify residents for these external services and connect residents to appropriate work related opportunities.

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<sup>3</sup> Based on performance to date and known contract levels, it is anticipated that the Work Programme and Working Capital will support c75 residents into employment per annum. The lower profile of job starts for Long Term Unemployed residents through WES is 400+ p.a in the first two years

<sup>4</sup> See the notes above regarding improving recording and to reduce the risk of double counting individuals that will be progressed through WES.

- 9.6 With these new services in place from March 2017, the council will connect more residents with the right service, first time, through effective assessment and triage. Officers will continue to seek external funding to support and grow delivery teams. Dialogue with Jobcentre Plus on sharing property assets will also be progressed.

## **10 Financial Implications**

- 10.1 The council has a sound track record of securing funding to support employment. On average over £1m had been secured per annum over the past five years. The service will be self-funding across the period to 2020/21 with no draw on the Council's General Fund. Efforts will be made to identify further potential sources of funding to adapt the service as to make it break even on an on-going basis.
- 10.2 Income set out in the cash flow in the Business Case (Appendix 1) is considered to be achievable. Income comes from existing committed reserves, including the Civic Enterprise Fund, bids for external funding, discretionary sources of finance and new commercial income. Financial risks and their management are set out in Appendix 2, page 29-30.
- 10.3 Three scenarios have been modelled for annual income. These scenarios range from the projected middle case of £1.2M per annum, a worst case of £0.75M and a best case of £1.9M.
- 10.4 Potential new income streams include from Section 106, engineered by introducing new thresholds for developer contributions aligned to what is an existing City Plan policy. The West End Business Rate Mechanism is to be included as well as miscellaneous grants which may include contributions from the Department for Work and Pensions. In the meantime, officers will continue to seek additional income to sustain the service beyond 2020/21 including from Public Health. External funding will be managed by the council's Economy Team.
- 10.5 Budgets for advisors and brokerage reflect the level of anticipated income. In the eventuality that roles duplicate other Government or charity roles, funding will be scaled back or re-directed. An annual mapping of provision will ensure the Council remains a funder of last resort. To manage the risks associated with the short term nature of a number of the income streams, reserves will be built up wherever possible. The current profiled cash flow shows a current net surplus of £180,000.
- 10.6 Income for employment programmes is often characterised by very short deadlines. Budgeting over a four year period will allow the council to effectively plan and deliver the Service against cyclical variations in the funding. Longer term budget profiling provides greater security for services. In particular, it helps reducing the risk of losing advisors worried about job security.

- 10.7 Supplier agreements will include break clauses and clear performance levels, benchmarked against comparable London and National provision. The initial four year period is also a reasonable timescale to evaluate performance of the Service as a whole.
- 10.8 The Cabinet Member will receive regular reviews on income and expenditure. Any variance will also be agreed with the Executive Director for Growth Planning and Housing who will have delegated authority to adjust and agree the budget for the Service in consultation with the Cabinet Member. Monthly income and expenditure will also continue to be reviewed by the City Treasurer's Department and there will be quarterly reporting to other Cabinet Members, including the Member for Public Health and Adult Services.
- 10.9 If more income is generated than profiled, the Council will, if necessary, scale up provision whilst also building up reserves. If income is less than profiled, service agreements will be reviewed and provision scaled back over the funding period.

## **11 Legal Implications**

- 11.1 Local Authorities can use their general power of competence under the Localism Act 2011 to provide this service. Further legal advice can be obtained when entering into any memorandums of understanding with partner agencies. The scheme will assist the Local Authority in supporting care leavers in finding employment and supporting vulnerable adults who have eligible needs under the Care Act 2014 and it is assessed that to meet these needs the Local Authority should support them in finding employment.

## **12 Staffing Implications**

- 12.1 There are no staffing implications arising from the implementation of this report. All services and staff will have time limited contracts to reflect the cash flow and actual income. This will be underpinned by service level agreements between the Council and services.

## **13. Consultation**

- 13.1 The following parties have been consulted to date and as part of the development of the Westminster Employment Service:

- Housing, Finance and Corporate Services Policy and Scrutiny Committee.
- Internal service departments and management teams and Executive Management Team.
- The Cabinet Member and Deputy Cabinet Member for Public Health and Adults.
- The Cabinet Member for Finance and Corporate Services.

- Central London Forward’s Director and neighbouring borough leads on employment and skills including Brent, Kensington and Chelsea, Camden and Islington.
- Front line practitioners and industry experts from across London via an expert panel convened.
- Jobcentre Plus and Clinical Commissioning Groups
- Westminster Construction Employers Group, Council contractors and
- Westminster Property Owners Association.
- Voluntary sector providers operating in Westminster through Provider Network meetings.
- Further Education Colleges including City of Westminster College and Westminster Kingsway College.

13.2 A summary of issues raised during the consultation and design phase of the Service is set out in the table below. Further engagement with stakeholders and employer will continue throughout the year and up to the proposed launch date of the service.

**Summary of issues raised during the consultation and design phase**

<b>Feedback</b>	<b>How the feedback will be addressed</b>	<b>Further work required</b>
<p><b>Triage and Assessment</b></p> <p>Opportunity to:</p> <ol style="list-style-type: none"> <li>1. Ensure that the interface with the service is broad, so more people are identified and captured.</li> <li>2. Build intelligence about demand</li> </ol>	<p>Residents will be identified from a wide range of Council services including through libraries, housing options, adults and children services, front line housing staff and the Adult Education Service. Introducing new, simple processes as part of the Council’s Front Door Programme will support this.</p> <p>The council will also work with other agencies including Registered Social Landlords, local charities Jobcentre Plus, GPs and health providers.</p>	<p>Ideas proposed including having a single list of those that have been identified needing support – which will be considered through the additional capacity proposed for the assessment and triage stage.</p> <p>Suggestion that the Council explores data sharing arrangements and looks at how this has worked elsewhere e.g. in Hammersmith and Fulham.</p>
<p><b>Employment support &amp; provision</b></p> <ol style="list-style-type: none"> <li>1. Clients value the peer-to peer support and networks offered by local providers</li> </ol>	<p>The Council will continue peer to peer activities and advocate to partners that will deliver under the Westminster Employment Service.</p>	<p>Additional advisor support is likely to be needed across the City to meet demand from residents. The Council</p>

<p>including Vital Regeneration, Cardinal Hume and LEST (WCC)</p> <p>2. The client / advisor relationship defines the quality of Service; and</p> <p>3. Manage the talent in the network of providers that might deliver under the WES brand.</p>	<p>Recognition of the value of advisors and the importance of this relationship has been reflected in our proposed use of available funding, with a greater emphasis on maintaining advisors over the duration of the programme.</p> <p>As above, the Council has successfully trialled an Advisor Academy and will continue this function to support growing the numbers of advisors employed by partners.</p>	<p>will continue to seek funding and partnering opportunities to increase advisor capacity.</p>
<p><b>Brokerage &amp; work with employers</b></p> <p>1. Change the employer ask – broaden and to include the role which employers can and do play in the preparation for work stage: presentation to raise awareness, pre-employment training, support for women with children, ‘patient’ work trials.</p> <p>2. Advisor relationships with employers – advisors invest in building trusted relationships with clients and their suitability.</p> <p>3. Employers finding suitable candidates</p>	<p>The existing brokerage function managed by Recruit London is changing to reflect the needs of long term unemployed clients.</p> <p>The council is exploring changes to the model which would include x2 brokers being integrated with advisor teams within the Council. Our budget for brokerage includes provision for a workplace co-ordinator to focus on the City Council’s supply chain and developers.</p> <p>Triage and assessment processes will identify higher numbers of residents and the proposal is to more effectively categorise how employers can support clients.</p>	<p>Further work will be undertaken on the ideas set out in the previous column.</p>
<p><b>Barriers to employment</b></p> <p>Providers and clients identified childcare as the biggest practical issue for low income earners, quality of information and up front deposits required</p>	<p>See the next column.</p> <p>Brokerage and support for employers will include an advisory function and advocacy of family friendly practices.</p>	<p>Meet with frontline advisors and Children Service to identify practical solutions. This could include working with a charity to specifically fundraise for childcare for residents that are unemployed.</p>

**If you have any queries about this Report or wish to inspect any of the**

**Background Papers please contact:**

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*NB: For individual Cabinet Member reports only*

For completion by the **Cabinet Member for Housing, Business, Regeneration and Economic Development**

**Declaration of Interest**

I have <no interest to declare / to declare an interest> in respect of this report

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

NAME: **Councillor Daniel Astaire, Cabinet Member for Housing, Regeneration, Business and Economic Development**

State nature of interest if any .....

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.....  
*(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter)*

For the reasons set out above, I agree the recommendations in the report entitled **Westminster Employment Service** and reject any alternative options which are referred to but not recommended.

Signed .....

Councillor Daniel Astaire, Cabinet Member for Housing, Business, Regeneration and Economic Development

Date .....

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment: .....

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If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Director of Law, the City Treasurer and, if there are resources implications, the Director of People Services (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy & Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from publication to allow the Policy and Scrutiny Committee to decide whether it wishes to call the matter in.



## Appendix

### Other Implications

#### 1. Resources Implications

1.1 See Financial Implications in the main body of the report.

#### 2. Business Plan Implications

2.1 All the commitments in the Statement will be incorporated into the relevant departmental business plans for 2017/18.

#### 3. Risk Management Implications

3.1 Risks for the Service, mitigations and their management are set out at Appendix 1.

#### 4. Health and Wellbeing Impact Assessment including Health and Safety Implications

4.1 See Appendix 1

#### 5. Crime and Disorder Implications

5.1 The Westminster Employment Service will support residents referred through Community Protection teams and the Police and residents at risk of offending and young people not in education or employment.

#### 6. Impact on the Environment

6.1 The service will more effectively connect local employers with residents thereby having a positive contribution on the environment.

#### 7. Equalities Implications

7.1 The Westminster Employment Service will support the City Council's equalities policies by supporting underrepresented groups in the labour market which include residents with disabilities and health conditions.

#### 8 Staffing Implications

8.1 See Financial Implications in the main body of the report.

#### 9. Human Rights Implications

9.1 There are no human rights implications.

## **10. Energy Measure Implications**

10.1 There are no energy measure implications.

## **11. Communications Implications**

11.1 A separate communications plan is being developed to support the service. The Service will be promoted across Council and partner channels to maximise uptake.