WRC Social and Economic Consultants

Specific Skills Training
Measure 13 of the EHRDOP
Implemented by FÁS

WIDER EQUALITY MEASURE STUDY

Supported by

Equality Studies Unit, Measure 33A of the EHRDOP

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Contents

List of Tables

List of Figures

List of Boxes

1.   Introduction

In the context of the Employment and Human Resource Development Operational Programme (EHRDOP), the Equality Authority is implementing Measure 33a: Technical Assistance – Equality Studies Unit (ESU). The ESU is mandated to examine labour market inequalities and their implications for labour market policy. Its focus is exclusion and discrimination in the labour market as covered by equality legislation and for particular groups named in the EHRDOP including older people, people with disabilities, minority ethnic groups in particular refugees, and members of the Traveller Community. A Management Committee, representing members of the EHRDOP Monitoring Committee and equality interests, is in operation to advise the Equality Authority on the work programme of the ESU.

In this capacity the Equality Authority has developed a rolling programme of Measure Studies. The aim of this rolling programme is to identify and promote changes required in the planning, design and delivery of the specific measures comprising the EHRDOP to enhance their capacity to promote equality and accommodate diversity. The relevance and value of undertaking measure studies was demonstrated in ESU report titled *An Assessment of the Position of Selected Groups in Three Measures of the Employment and Human Resources Operational Programme*. That report provided a preliminary assessment of how people from the four groups are being accommodated in three measures of the EHRDOP and identified the issues arising in adopting a more systematic approach to undertaking measure studies.

WRC Social and Economic Consultants have been contracted by the Equality Authority to carry out the measure studies. These studies draw on the analysis developed in their report for the ESU *Accommodating Diversity in Labour Market Programmes*. This report, which synthesised the findings of a number of earlier ESU research reports, detailed the labour market situation of the four groups and their concerns together with an initial analysis of the capacity of the measures comprising the EHRDOP.

Three initial exploratory measure studies were undertaken in 2004. This report presents the findings of one of these, the study of Measure 13 Skills Training for the Unemployed and Redundant Workers – Specific Skills Training (SST) implemented by FAS. The other two measures in this first series were Measure 12B Sectoral Entry Training Tourism (SETT) implemented by Failte Ireland and Measure 21 Lifelong Learning – Back to Education Initiative (Part-time Option) (BTEI-PTO) implemented by the Department of Education and Science through the Vocational Education Committees.

As a package, the first three studies aimed to develop and test the methodology for undertaking the rolling programme of measure studies as well as to provide an initial understanding of how the implementing agencies involved are addressing the Wider Equal Opportunities Principle (WEOP) of the National Development Plan (NDP). The WEOP is concerned with understanding, monitoring and supporting the participation of older people (i.e., people aged 50 years and over), people with disabilities, refugees, and members of the Traveller Community in the programmes comprising the EHRDOP. The output of each of the three studies is a concise report documenting the position of the four groups in the operation of the measure together with an analysis of the factors seen as contributing to the accommodation of the people from the four groups in the measure. Also, the experience of and lessons derived from the three initial measure studies will feed into shaping the design of the rolling programme of measure studies.

It is important to note from the outset that the measure studies are being undertaken with a view to contributing to capacity building in the area of equality among implementing agencies. In seeking to support a process of change the measure studies require the full engagement of those responsible for the design and delivery of the measures concerned. Measure studies are therefore undertaken on the

basis of a partnership between the Equality Authority and the organisation responsible for the measure in a way that achieves ownership of the process by the implementing agency. The outputs of the measure studies are subject to the decisions of the implementing agencies and are therefore owned by them.

While the initial three measure studies were in progress the EHRDOP Monitoring Committee agreed to prioritise the application of the WEOP to 10 measures of the EHRDOP, including the three measures that were the subject of the initial measures studies. While formally distinct exercises the subsequent review process of the 10 measures prioritised in relation to the application of the WEOP was informed by the approach and results of the three initial measure studies.

2. Objectives and Methodology

The main objectives of the three initial exploratory measure studies were to:

- Identify and document current understanding of the issues for older people, people with disabilities, Travellers and minority ethnic groups among organisations responsible for delivering measures;

- Identify existing practices and barriers regarding the application of the NDP's horizontal principle of equal opportunities to these groups;

- Examine how equality practices can be incorporated into the design and delivery of programmes; and,

- Identify any supports needed to improve practice in this area.

The criteria involved in selecting the three measures for study included ensuring that each measure had a different implementing agency and that each measure itself was of relevance to addressing the needs and concerns of the four groups as identified in the report *Accommodating Diversity in Labour Market Programmes*. In the case of FÁS the measure selected is Measure 13, Skills Training for Unemployed and Redundant People, more commonly referred to as Specific Skills Training (SST). Before introducing the methodology employed in this instance, it is important to note the narrow scope of the study. For example, the study is not put forward as representative of FÁS Training Services, which provide a range of in-centre provision (e.g. apprenticeship) as well as external provision (e.g. CTWs). It is also the case that other initiatives delivered by FÁS either directly or indirectly accommodate the target groups covered under the WEOP.

The methodology for this study involved:

1. Identification of appropriate courses and locations for study in consultation with the Director for Social Inclusion and the Acting Director, Training Services[1]

2. Presentation of scope and nature of study to various groups within FÁS including

    - Dublin Training Service Managers

    - Dublin Partnership Group

    - Midlands Local Partnership Group, Training Services

    - Head Office Training Services

    - Head Office Training Services Unit

    - Research and Planning Unit

3. Undertaking a review of documentation concerning the design and delivery of SST and related documentation on monitoring and reporting on the measure. In the case of SST, the documentation examined included the programme complement for the measure and monitoring reports covering the years 2000, 2001, 2002, and 2003. Additional documentation collected and reviewed included the FÁS Strategy Statement (2003-2006), its annual reports (for 2000, 2001, 2002) as well as its Customer Charter, its Employee Code of Ethics and other documentation;

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[1] The following Centres and courses were selected for study: (1) Ballyfermot Training Centre - Computer Application and Office Skills (430) & Basic Welding (080); (2) Jervis Street Training Centre - Computer Application and Office Skills (430); (3) Athlone Training Centre - Welding and Fabrication (040) and Computer Application and Office Skills (430).

4. Undertaking a set of semi-structured interviews with relevant personnel at Corporate / Head Office and Training Centre levels. The personnel interviewed included, the Director for Social Inclusion (1), the Manager of the Equal Opportunities and Social Inclusion Section (1), the Acting Director of the Training Support Unit (1), Employment Services Officer (1), Training Centre Managers and Assistant Managers (5) and course instructors (5). The issues that were covered in these interviews include the following:

- Identifying levels of awareness concerning the Wider Equal Opportunities Principle (WEOP) of the NDP and its application to the measure

- Documenting the current state of play regarding actions taken to secure equality on the four grounds

- Investigating the actual experience of and identifying the lessons arising from engagement with members of the four groups

- Identifying the factors that have shaped / influenced the actions taken in relation to applying the WEOP to date

- Identifying plans or future directions in relation to securing equality on the four grounds in the measure

- Identifying concerns and the issues arising in relation to securing equality on the four grounds in future actions

- Identifying the nature of the resources required to secure greater equality on the four grounds.

3.   Implementing Body - FÁS

3.1 Role and Organisational Structure

FÁS (the National Training and Employment Authority) was established in January 1988 under the Labour Services Act 1987 to provide a wide range of services to the labour market in Ireland. Its functions as laid down in the Act are:

- Training and re-training

- Designated apprenticeships

- Recruitment service

- Employment schemes

- Placement and guidance services

- Assistance to community groups

- Advice for people returning to Ireland and those seeking employment elsewhere in the EU

- Consultancy and human resource related services, on a commercial basis, outside the State (through FÁS International Consulting Ltd.).

The statutory functions of the organisation also include the collection and publication of information relating to the labour market and the provision, to the Minister of State for Labour Affairs and the Minister for Enterprise Trade and Employment, of information, reports and other documentation on matters within FÁS' remit.

Responsibility for vocational training and employment in the open labour market for people with disabilities transferred from the Department of Health and Children to the Department of Enterprise, Trade and Employment in June 2000 as part of the Government's policy to mainstream services for people with disabilities. This meant that vocational training and employment services, formerly administered by NRB on behalf of the Department of Health and Children, would now be administered by FÁS.

In its Annual Report 2000, FÁS noted that people with disabilities have always availed of its services but the full transfer of responsibility for training and employment services for people with disabilities meant that FÁS had to put in place a range of initiatives such as a training and development strategy for its staff (which is ongoing), an environmental access audit of its premises and the setting up of a national Disability Policy and Development Unit to ensure "FÁS maintains a focus on people with disabilities". In July 2000 FÁS launched a Supported Employment Programme for People with Disabilities in conjunction with the Department of Enterprise Trade and Employment.

FÁS also contracts with a number of specialist organisations to provide vocational training for people with disabilities. Approximately 2,000 people with disabilities avail of this specialist training provision. It is notable that training that is certified at a commensurate level with the mainstream, in-centre provision in question in this report, is also provided through the services of the specialist organisations. That provision is not addressed in this report.

The organisation has its headquarters in Dublin but operates through a regional structure (8 regions) throughout Ireland in which there are a total of 20 Training Centres and 62 Employment Offices. In 2002 about 90,500 unemployed job seekers or other individuals completed FÁS programmes, and, at the end of the year, 48,300 persons were on FÁS programmes.

FÁS also provided financial support for the training of an estimated 10,300 employees in about 2,100 companies under the Training Support Scheme. During 2002 about 110,000 persons registered with FÁS and 103,000 vacancies were notified to FÁS Employment Offices.

FÁS expenditure in 2002 amounted to €858.5 million. At the end of 2002 FÁS employed 2,358 staff, the largest proportion of which is concentrated in Training Services. In its Strategy Statement the organisation notes that:

- 10% of its staff are managers

- 41% of staff are over 50 years of age and 15% are due to retire by 2006 (including 21% of all managers)

- 57% of all staff are men and 43% of all staff are women

- 10% of women are at management grades

The head of FÁS is the Director General. The Assistant Directors General (ADGs) report to the Director General across a range of headings, for example: Special Projects; Corporate Services; Employment Services; Regions; Training Services; Services to Industry; HR Development/Finance; Community Services). A number of Directors report, in turn, to the ADGs and, for the purposes of this study, the most important of these is the Director responsible for Social Inclusion who reports to the ADG for Employment Services and the Director responsible for Training Services who reports to the ADG for Training Services.

For the purpose of this report the organisational structure / reporting lines operated by FÁS in relation to the delivery of SST is presented below although it should be noted that our engagement with the organisation started at Director level and moved downwards: The Director for Social Inclusion briefed more senior management on the study.

Figure 3.1: Operational Structure of FÁS as it Concerns the Delivery of SST
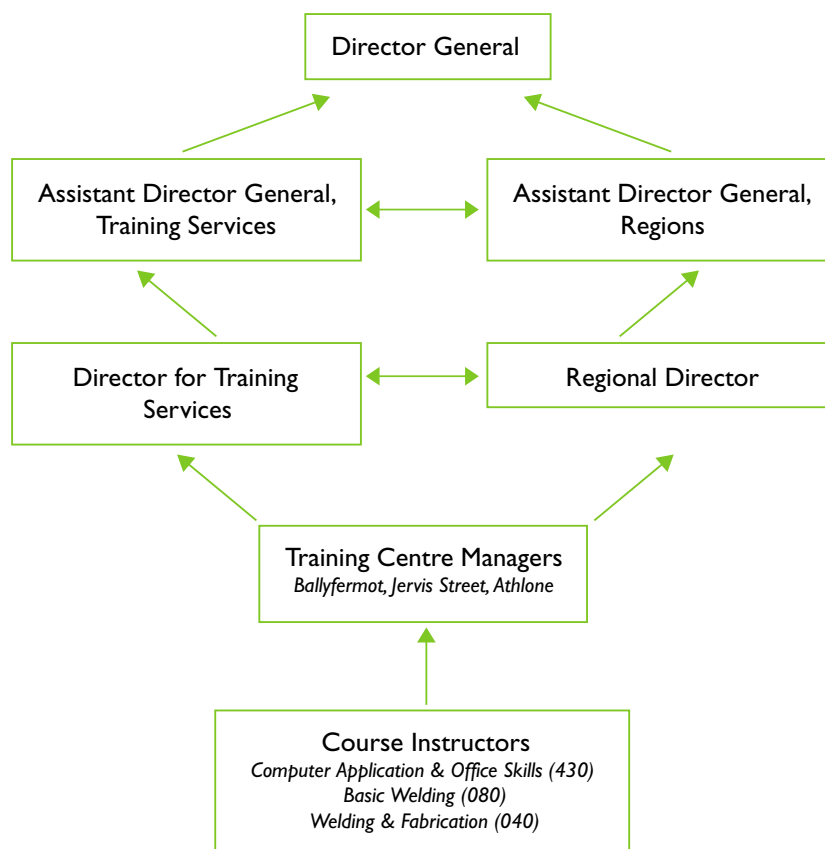
3.2 Equality Policies and Practices

FÁS does not have a stand-alone, over-arching Equality Statement. Instead, its commitment to equality policies and practices is expressed through a range of corporate documentation.

Strategy Statement 2002-2005

In Chapter 3 of its Strategy Statement 2002-2005 the policy requirement to ensure greater levels of female participation in the labour market and to ensure equal opportunities is referenced (3.16) and the document goes on to stress the need to:

> "generate employment opportunities for all, paying particular attention to those who are socially disadvantaged, such as early school leavers, long-term unemployed people, those with literacy and numeracy difficulties, ethnic minorities and travellers. Part of this approach, to tackling inequalities, includes a co-ordination of efforts between all relevant state agencies."

In Section 4.12 of the Strategy Statement (Internal Analysis, HR Development) it is noted that:

> "FÁS will deliver all of its programmes and services in a fair and equitable manner and will also continue to ensure that equality of opportunity is available for all, by a specific focus on special target groups of people, where necessary, and the promotion of more non-traditional training and employment opportunities for women."

Among the Core Values listed in Section 6 of the Strategy Statement is 'Caring':

> "Appreciating diversity in the experience and perspectives of our customers and that of staff at all levels. Having a culture that respects and values each other and our customers as equals."

Code of Practice

The Code of Practice for staff emphasises the following core values without expressly mentioning equality:

- Flexibility;
- Professionalism;
- Caring;
- Proactive;
- Trustworthiness.

The guiding principles for all staff are given to be: honesty; integrity; and public accountability.

Customer Charter

In its Customer Charter, the organisation says it 'cares about its customers' and that it is 'responsive and flexible' vis-à-vis their needs. Specifically in relation to equality it says it will:

> "Provide [its] services to all customers in a courteous, fair and impartial manner and in full compliance with all equality legislation. Facilitate access to FÁS services for people with disabilities."

3.3 Other Equality Related Matters

It is worth noting that FÁS has regularly been thanked for the quality of the data it produces for the Monitoring Committee meetings of the EHRDOP, including equality related data.

FÁS has carried out an Equality Proofing Pilot Project through its Employment Services. The project was planned with the Equal Opportunities and Social Inclusion Unit as a first step to assist FÁS to

proactively enhance its capacity to be the leading Irish state agency in achieving equal access, participation and outcomes for the nine groups covered under the equality legislation so that the conditions of those groups who currently experience inequality in Ireland are substantially improved.

One of the key concerns of the pilot project is to determine what action is required by service providers to overcome past and current obstacles to participation for groups, covered in the equality legislation and experiencing disadvantage in the labour market, so that equality outcomes can be achieved. A final report will be presented to the Equality Proofing Steering Group in October 2004 where there will be an agreed approach to mainstreaming the recommendations throughout the whole organisation. Action Plans will subsequently be developed for equality proofing within Training Services and Services to Businesses modelled on that experience.

Through its intranet system, FÁS provides Good Practice Guidelines on Equal Opportunities aimed at supporting staff in dealing with clients from an equality perspective and explaining their responsibilities under the equality legislation. In addition, equality has been incorporated into on-going staff training and development, for example in the inclusion of Equality Matters into the Certificate in Training and Continuing Education provided through NUI Maynooth. FÁS, in association with NUI Maynooth, has also developed a Certificate in Equality Studies in Training and Development that will be piloted in late 2004 and/or early 2005.

FÁS has also been active in providing its staff with various types and levels of training designed to enhance the organisation's capacity to deliver services to people with disabilities:

1. Training of Employment Service Officers in Guidance of People with a Disability

Up until September 2002 almost 300 officers were provided with training delivered by a consortium led by the Central Remedial Clinic. The programme was of three days duration and addressed the following skill and knowledge areas:

- Equal Opportunities issues

- Mental Health Issues

- The Guidance Process for a person with a disability

- Assistive Technology

The programme had a strong emphasis on case studies and links to FÁS materials. Newly appointed officers undertook the programme in October 2003.

2. Dispersal of Information on Disability Matters to the Regions

In order to ensure that accurate information was available to field staff, nominated ESOs were trained and they, in turn, made available accurate information to their colleagues.

3. Training in Monitoring of the Delivery of Specialist Training

In 2001 FÁS prepared guidelines for the delivery of specialist training. FÁS prepared and delivered three training programmes related to the implementation of these guidelines. The programme, provided to community service officers, covered design, delivery and monitoring of specialist training programmes.

4. Training of Instructors in Supporting People with Disabilities in Training

Supporting People with Disabilities in Training is a five-day training programme developed for Training Centre Instructors, piloted in February 2002. This comprehensive programme covers modules on assistive technology, mental health and the impact on learning, networking and local resources. This training programme compliments FÁS' "Guidelines for Supporting People with Disabilities in Training". In addition, a three-day training programme in using JAWs for Windows with different applications was provided for Computer Application Instructors.

4. Measure 13: Skills Training for the Unemployed and Redundant/SST

4.1 Overview of Measure

Skills Training for the Unemployed and Redundant Worker or Specific Skills Training (SST) is one of 22 measures comprising the Employability Pillar of the EHRDOP. The overall priority of all Employability measures is "helping and actively encouraging people to be, or to become, employable" (EHRDOP, p.66). Within this overall priority, each of the measures comprising the Employability Pillar of the EHRDOP is associated with one of three specific objectives: (i) mobilising labour supply; (ii) adopting a preventative approach to unemployment; and (iii) securing social inclusion. SST is designed to contribute to the first of these objectives. As stated in the EHRDOP "The Mobilisation of Labour Supply is a policy priority designed to ensure that all potential sources of labour supply in the economy – including increased female participation, married 'returners', older workers, people with disabilities and immigrants – become available for employment" (EHRDOP, p. 67).

SST is described in the Programme Complement as follows:

> "Under this Measure, FÁS will deliver a wide range of skills training courses through its network of training centres and through contracted training providers. Through its participation on the Future Skills Group, the Industrial Training Committees and regular contact with employers, employer organisations and Trades Unions, FÁS will ensure that the range of courses provided reflects the recruitment demands of industry. Special assistance will be provided in cases of major factory or business closure. Training courses will also be provided for women who wish to consider returning to the workforce."

According to the Programme Complement for Measure 13, the overall aim and objective of SST is:

> "To provide training to unemployed and redundant workers so as to assist them in obtaining employment and employers in obtaining skilled recruits."

The Programme Complement also describes the intended beneficiaries of SST as:

> "Unemployed persons; redundant workers and women returning to the workforce…"

Planned throughput 2000 – 2006 is 35,000 of which 14,700 (42%) are anticipated to be male and 20,300 (58%) to be female. The Programme Complement signals a 75% placement target for those completing training and a target of 75% completing with certification. Within one year of completion, 80% of participants will be in employment or further education/training.

The Government Department responsible for SST is the Department of Enterprise, Trade and Employment and the implementing body is FÁS. The budget allocation for SST as stated in the Programme Complement is €181.43million, of which €141.62million is allocated to the Southern and Eastern (S&E) region and €40.81million. to the Border, Midlands and West (BMW) region. All elements of the programme are co-financed through the European Social Fund.

As a result of the Mid-term Evaluation of the Operational Programme the budget available for SST was increased (by €9million) based on the likely increase in redundancies and the continuing demand for provision available under the Measure.

4.2 Programmes Comprising SST

There is a wide range of provision covered under the SST measure and there are changes in the type and number of courses as a result of annual review in line with industry and local demand. For

example, in 2002, 13,027 persons completed SST courses across in excess of 80 skills courses. In June 2002 FÁS introduced a new database containing the various courses available. The system provides comprehensive details of the Training Specification, Training Plan and objectives for all available modules as part of an on-going project to harmonise the title, content and structure of all FÁS courses. Phase 2 of this project was implemented in February 2003. The types of courses available to unemployed persons and redundant workers are varied and include, for example:

- Accounting Technician Foundation Course

- Aircraft Maintenance – Basic Metalwork, Skills, Basic Aeronautical

- Beautician/Aestheticienne

- Business Appraisal Training Programme

- Cided Pipe Welding

- Computer Aided Engineering – Milling and Turning

- Electronic Assembly Skills

- Graphics

- Hairdressing

- Horticultural Training

- Logistics and Distribution

- Signwriting

- Word Processing

For the purposes of this study, courses and training centres were selected in consultation with FÁS; see Table 4.1 for details.

Table 4.1: FÁS Training Centres and Associated SST Courses Participating in the Study

Centre	Course Name
Ballyfermot Training Centre	Computer Application and Office Skills (430) Basic Welding (080)
Jervis Street Training Centre	Computer Application and Office Skills (430)
Athlone Training Centre	Welding and Fabrication (040) Computer Application and Office Skills (430)

A brief description of each of the courses is provided in Box 4.1.

Box 4.1: Description of SST Courses Involved in the Study

Course Title	Course Description
Computer Application and Office Skills (430)	The course aims to provide trainees with the skills and related knowledge in a broad range of computer applications and office skills and to develop their attitude, personal effectiveness and job seeking skills to enable them to obtain employment. The course is of 25 weeks duration, 21 of which are in-centre and 4 of which are spent on placement. Trainee profile as per the training specification includes the following criteria: applicant having reached statutory school leaving age; Junior Certificate Standard of education or progression from Basic Keyboard and Computer Skills course; good numerical and literacy skills and aptitude for office work; good oral and written skills desirable as is previous computing experience. No assessment of candidates.
Basic Welding (008)	The course aims to provide the trainees with the skills and related knowledge in reading of drawings, manual metal arc welding, MIG welding and TIG welding and to develop their attitudes, personal effectiveness and job seeking skills to enable them to obtain employment as welders. The course is of 19 weeks duration, 16 of which are spent in-centre and 3 in the form of in-company placement. Trainees must be at least of statutory school leaving age and possess a Junior Certificate or have reached an equivalent standard. Trainees should have good spatial aptitude, good hand/eye co-ordination and good manual dexterity. The training specification notes that trainees must not wear contact lenses during training and that appropriate aptitude tests may be applied.
Welding and Fabrication (040)	The course aims to provide trainees with the skills and related knowledge in fabrication – basic skills, manual metal arc welding, oxy-acetylene, MIG welding – and to develop their attitudes, personal effectiveness and job seeking skills which will enable them to obtain employment as welders/fabricators. The course is of 24 weeks duration, 20 of which are in-centre and 4 of which involve an in-company placement. Trainee profile as per the training specification includes the following criteria: applicant having reached statutory school leaving age; Junior Certificate standard of education or its equivalent; good numerical and spatial aptitude as well as good manual dexterity and good motor co-ordination. The training specification notes that trainees must not wear contact lenses during training and that appropriate aptitude tests may be applied.

4.3 Summary of Recruitment Procedures for SST

Advertising

Specific Skills Training courses are advertised through FÁS Head Office in Dublin and through its network of training centres and employment service offices countrywide using the interactive Watis Machines, leaflets and other materials. Courses are also advertised via the FÁS website. The range of FÁS provision is also advertised via various high profile events that FÁS is associated with such as the annual 'Opportunities' employment fairs. However, none of the training centres we visited independently advertises its own services or the available courses within its own community. In fact, none of the training centres we visited had any form of promotional material describing the centre, its staffing complement, its place in the general scheme of state provision and/or its linkages with other agencies. That said, it is generally understood within FÁS that the advertising of provision is the responsibility of the Employment Service Division and not Training Services and this, in part, explains the lack of locally generated promotional materials.

First Point of Contact – Employment Service Officer

All prospective trainees must first meet with an Employment Service Officer (ESO) before gaining access to any FÁS course. There are approximately 300 ESOs located at 49 Employment Service Offices throughout Ireland.

Many FÁS clients first encounter an ESO through the National Employment Action Plan (NEAP) process, in which case the client is referred to FÁS by the Department of Social and Family Affairs. Alternately, an individual may self-present. Under the NEAP activation process the ESO will 'make the running' up to the point when the individual is allocated to a particular programme or scheme or possibly referred back to welfare. In our discussions with FÁS personnel it was suggested that the NEAP process represents approximately 40% of the ESO caseload at any one time. In the case of self-presentation, the individual concerned needs to be more pro-active in his/her engagement in order to compete with the ESO's priority caseloads including NEAPs clients, LES clients, Special Needs clients and a fourth category that includes Travellers and ex-offenders.

FÁS has an extensive guideline regarding the objectives of its Employment Placement Service both from the perspective of its interaction with trainees and of prospective employers. The guideline is currently being revised on foot of an equality proofing exercise that was carried out on Employment Services. However, the current guideline notes that the core objectives of the service are:

> "to provide a quality guidance and placement service to the unemployed, to provide a speedy recruitment response to employers, to deliver Government programmes and to evaluate the impact of services on clients."

The guideline notes that the role of the officers is:

> "to provide jobseekers with a confidential, individual career-path planning, guidance and counselling service, and to provide employers with a speedy and effective recruitment service. Confidentiality, and the interests of clients, must be paramount at all times."

The Employment Service Officers (formerly known as Placement Services Officers) will:

- Have a customer friendly, pro-active approach

- Achieve the best possible employment outcome for each jobseeker based on his/her needs and organise and monitor activities in response to assessed needs of jobseekers, so that they become "job ready" as effectively as possible, and are subsequently placed in employment

- Organise follow-up meeting with jobseekers, if required, within 10 working days of initial contact

- Supply each jobseeker with information on their rights/entitlements

- Promote equal opportunities for all jobseekers

- Provide support to jobseekers in progression from training and CE

- Liase with other FÁS Units in order to ensure the provision of opportunities/courses for clients

- Network with the Department of Social Community and Family Affairs to deliver the Employment Action Plan

- Maintain the case-load/tracking system where appropriate

- Be aware of boundaries and refer jobseekers to other agencies/professionals where appropriate

- Market the service in a pro-active way

- Provide a full candidate screening process for employers where appropriate

- Communicate with and visit/canvass employers

- Provide effective support systems for all customers.

Registration and Assessment

In all cases the prospective trainee completes a Standard Registration Form that captures a range of basic demographic information relating to the individual, for example:

- EEA Citizenship

- Highest level of education and further education awards

- Employment history and work-related skills

- Level of proficiency in a foreign language

- Whether the individual is a member of the Travelling Community

- Whether the individual is a programme refugee, a convention refugee or a person with leave to remain

- Whether the person considers him/herself to have a disability.

The last three points above are covered under Part 5 of the form, Equal Opportunities. In that section, if the individual considers that s/he has a disability, s/he is asked "to specify any special needs that may need to be addressed" if they are to avail of training or employment. The Equal Opportunities section is prefaced with the following sentences:

> "FÁS is committed to offering equal opportunities to everyone. As part of the FÁS Equality commitment the following information will help us to monitor our equal access policy and to develop programmes to meet specific needs."

At the time of writing, FÁS is piloting a revised Registration Form in the North-East and South East regions. The changes to the Equal Opportunities section (Section 3) of the revised draft form are minimal. Rather than ask the person completing the form if they consider that they have a disability, the revised form asks the individual to indicate "if you are a disabled person".

It is also noteworthy that the revised form asks the candidate if s/he is a citizen of an EEA state and, if not, if s/he can supply documentary evidence to confirm status to work or undertake vocational training in Ireland.

Based on the form and discussion with the ESO, those individuals who opt for training (rather than attempting to directly access employment) are assigned to a waiting list for a forthcoming course. In some cases individuals may be assigned to a waiting list for what is known as a bridging course or some

other preparatory course before moving onto a full, mainstream SST course. For example, before accessing Computer Application and Office Skills (430), an individual may first complete the ECDL course.

There is relatively little formal assessment of prospective trainees in respect of most SST provision. Nor are there any formal educational requirements for SST courses. Instead, the term 'Leaving Certificate or its equivalent' or, in certain instances, 'Junior Certificate Standard' is used and this allows for broad interpretation.

Box 4.2 summarises the recruitment procedures used in relation to SST.

Box 4.2: Recruitment Procedures for SST Courses

Stage	Recruitment Proceedures
Publicity and Advertising	Primarily through FÁS Head Office and the FÁS network of Employment Offices and Training Centres. Documentation may also be made available through, for example, local development companies and FÁS itself is involved with a number of high profile events such as the 'Opportunities' series of employment fairs.
	The Training Centres themselves do not directly advertise or sell their services to the community at large.
Application	In practically all cases, application for SST courses must originate through a face-to-face meeting with an Employment Service Officer (ESO). The ESO deals with a number of potential flows of applicants, including those who are 'activated' through the NEAP activation process. It is however possible to present to an ESO independent of the NEAP process.
	In some instances it is possible for people who had previously met with an ESO and subsequently moved onto bridging provision to progress directly onto a mainstream SST course.
	Would-be SST participants are organised under four priority headings including NEAPs clients, Special Needs clients, LES clients and a fourth category that includes Travellers and Ex-offenders.
Selection	Selection is on the basis of interview with the ESO and the individual's stated preferences. There are effectively no educational or like requirements in place that might block an individual who presents from accessing the course of his/her choice. That choice (within the menu of SST courses in general) is limited only with reference to its availability at local level.

It is worth noting that until relatively recently, prospective trainees were interviewed by trainers before gaining access to particular courses in particular centres. In other words, the trainer had a certain amount of discretion on the intake and therefore on the make-up of his/her class. This led to some criticism regarding what is known as 'cherry-picking' with a view to meeting placement rates. The new system has removed that discretion from the trainers but has, according to trainers and other centre based personnel we interviewed, resulted in anomalies that are relevant to this study. For example:

• The trainer has very little idea of the make-up of the class until s/he is faced with the trainees;

• The trainer has little or no knowledge of special needs that exist among trainees;

• The trainer has no discretion over the number of special needs (broadly defined) individuals that s/he will encounter and yet all individuals are expected to move through the system at exactly the same speed.

4.4 Issues Related to Equal Opportunities During Selection

The Placement Service Guideline notes that the Placement Officer (subsequently referred to here as the Employment Service Officer or ESO) will carry out an assessment of training needs that can include the testing of clients' abilities and aptitudes. A suite of tests will be available locally and organised at regular intervals between Employment Services and other FÁS divisions as appropriate, for example typing or colour vision tests. The outcome of such tests will be discussed with the jobseeker and the ESO and files updated.

As previously noted, these guidelines are being revised and current practice involves minimal testing. Also as noted above, both the current and the revised draft Registration Form have Equal Opportunities sections through which FÁS can record and monitor the numbers of Travellers and people with disabilities registering and moving onto courses. As it stands, both the current and revised forms capture information regarding refugee status but do not seek any further detail regarding ethnic background although we understand that both nationality and ethnic background are captured through the social welfare Infosec system to which FÁS has access. Both the existing and the revised forms capture information on sex and age.

The existing guideline notes that, in conjunction with Training Services, Employment Services will actively seek the provision of suitable training places (mainstream or bridging programmes) within agreed time-scales for its clients. In conjunction with other relevant FÁS Divisions, Employment Services will ensure that the trainee profiles and entry requirements are accessible to jobseekers and are within the core principle of offering training to those most disadvantaged in the labour market.

4.5 Data Collection and Reporting Procedures for SST

The standard Registration Form collects basic demographic data including gender, age and educational level as described in Section 4.3 above. The data contained in the Registration Form is used to provide a profile of participants. This profile, which is included in the FÁS Monitoring Reports on Measure 13 to the EHRDOP Monitoring Committee, provides data on gender, age (i.e., under 25 years, 25 years and over), pre-training status (long-term unemployed, unemployed, employed, in full-time education), and pre-training education (i.e., none, Group Certificate, Junior Certificate, Leaving Certificate, Third Level, Other). A profile of the participants in SST 2002 and 2003 is presented in Section 4.6.

Data on the numbers of participants acquiring certification and the numbers progressing to employment or other outcomes is collected in two ways. First, data on the numbers of participants receiving certification and on the progression status of participants during the weeks following completion of their courses is collected and collated at the level of individual training centres in association with the Employment Service Officers, part of whose function it is to ensure that data on FÁS trainees is as up to date as possible. The second way in which data on outcomes is collected is by way of a follow up survey of participants undertaken by the ESRI on behalf of FÁS.

As mentioned in Section 4.3 above, FÁS is currently piloting a new Registration Form. The form will capture all of the information previously captured; however, it does not capture information regarding ethnic background other than whether the person is a member of the Traveller community.

4.6 Profile of Participants Based on Data Collected in Registration Forms

Table 4.2 presents an analysis of throughput on all SST courses 2002 and 2003. As is evident from the table, women are significantly better represented than men (e.g. 63.4% vs. 36.6% in 2003). Likewise, those aged 25 years and older significantly outnumber those aged less than 25 years. Those categorised as unemployed (less than 12 months) represent almost 100% of throughput. Finally, amongst throughput in 2002 and 2003 there were, respectively, 207 (2%) and 51 (1%) participants who had declared a disability.

Table 4.2: Profile of SST Throughput at National Level 2002 & 2003

	2002 %		2003 %	
Gender				
Men	39.5		36.6	
Women	61.5		63.4	
Age				
< 25	35.48		28.92	
25 +	64.52		71.08	
Pre-Training Status				
Long-Term Unemployed	0		1.71	
Unemployed	100		98.29	
Employed	0		0	
Full-time Education	0		0	
Pre-Training Education				
None	21		19	
Group / Junior Certificate	17		14	
Leaving Certificate	52		52	
Third Level	1		2	
Other	9		9	
Number of Participants by Gender	M	F	M	F
	5,146	7,881	2,376	4,115
TOTAL ALL THROUGHPUT	13,027		6,491	

Source: Monitoring Committee Statistics.

Throughput for 2003 in all SST courses at the three centres visited during the study is as follows:

Table 4.3: SST Throughput 2003 for Athlone, Ballyfermot and Jervis Street

Training Centre	Male	Female	Total
Athlone	113 (64.6%)	62 (35.4%)	175
Ballyfermot	215 (78.2%)	60 (21.8%)	275
Jervis Street	31 (18.3%)	138 (81.7%)	169
TOTAL 3 CENTRES	359 (58%)	260 (42%)	619
As % of all SST courses 2003:	9%	6%	7.5%

5.   Participation of the Four Groups in SST

Data for Tables 5.1, 5.2 and 5.3 were provided by FÁS. They relate to 2003 throughput in respect of the four groups covered under the WEOP in respect of particular SST provision at the three Training Centres involved in this study. This data is available to FÁS on the basis of the FÁS database which is informed by the Participant Registration Form although further breakdown with regards to age and detail regarding disability (the figures below encompass those in receipt of various forms of benefit and allowances) were produced through the FÁS interface with the Department of Social, Community and Family Affairs database.

Average per centre participation in SST by older people (45+) is 13.2%. Average per centre participation by people who had declared a disability is 2.8%. There are no Travellers amongst the 619 throughput across the three centres. The system does not produce data relating to ethnic background.

Table 5.1 Athlone: Throughput of Participants in SST 2003 from Four Groups by Gender

	Men	Women	Total
Older People (45+)	12 (10.6%)	9 (14.5%)	21 (12%)
People with a Disability	3 (2.7%)	1 (1.6%)	4 (2.3%)
Member of Traveller Community (Irish)	0 (0%)	0 (0%)	0 (0%)
Ethnic Origin (Black, Asian, Mixed Ethnic Group, Other)	Not known	Not known	Not known
All Other Participants	98 (86.7%)	52 (83.8%)	150 (85.7%)
Total Number	113	62	175

On the basis of the interviews with FÁS personnel the following broad areas of consensus were identified in relation to the participation of members from the four groups in SST:

1. Older people participate in courses organised under SST and are considered to have a positive influence on the general learning atmosphere. Staff are generally of the view that there is nothing in the FÁS system that militates against participation by older people and training centre personnel noted that it is there is now little resistance by employers to taking on an older person for placement and/or on a fulltime basis.

2. Very few people who declare a disability on registration actually participate in courses organised under SST and there is little evidence of an upwards trend. The small numbers of people with disabilities participating makes it difficult for staff and other trainees to become used to and skilled in dealing with people with disabilities despite ongoing training within the organisation. The existence of alternate and what is termed 'specialist' provision impacts on levels of participation as does a possible lack of awareness within the disabled community of their right to access mainstream services. According to some of those interviewed, at least some people with disabilities are not interested in mainstream employment because of the possible threat to various forms of welfare otherwise available to them and, where that is the case, individuals can move from specialist course to course almost indefinitely.

3. Members of the Traveller Community do not, in general, participate in SST and in the case of the courses at the three centres that are involved in this study, no Travellers participated during 2003. There are a variety of possible reasons for this, including the existence of alternate, segregated provision through the Senior Traveller Centres and the fact that mainstream services are not 'sold' to members of the Traveller community.

4. The ethnic mix of participants on courses organised under SST is increasing (particularly in Dublin-based centres) although the actual numbers of such participants are not counted through the system. None of the staff members we interviewed were aware of any particular issues or problems relating to the growing mix of participation in SST by people of different ethnic background and, inasmuch as difficulties arise, they tend to relate to language or are evident in characteristics of particular individuals rather than of groups from a particular ethnic background. However, training centre personnel did note that the prejudice that they once encountered in relation to placing older people has effectively been 'transferred' onto ethnic minorities and, in particular, those from central and southern Africa.

Table 5.2 Jervis Street: Throughput of Participants in SST 2003 from Four Groups by Gender

	Men	Women	Total
Older People (45+)	4 (13%)	19 (13.8%)	23 (13.6%)
People with a Disability	0 (0%)	8 (5.8%)	8 (4.7%)
Member of Traveller Community (Irish)	0 (0%)	0 (0%)	0 (0%)
Ethnic Origin (Black, Asian, Mixed Ethnic Group, Other)	Not known	Not known	Not known
All Other Participants	27 (87%)	111 (80%)	138 (81.6%)
Total Number	31	138	169

Table 5.3 Ballyfermot: Throughput of Participants in SST 2003 from Four Groups by Gender

	Men	Women	Total
Older People (45+)	27 (12.5%)	12 (20%)	39 (14%)
People with a Disability	3 (1.4%)	1 (1.7%)	4 (1.4%)
Member of Traveller Community (Irish)	0 (0%)	0 (0%)	0 (0%)
Ethnic Origin (Black, Asian, Mixed Ethnic Group, Other)	Not known	Not known	Not known
All Other Participants	185 (86%)	47 (78.3%)	232 (83.6%)
Total Number	215	60	275

6. Views of Head Office Personnel on the Wider Equal Opportunities Principle and Related Issues

Head Office staff members were of the view that very few people within the organisation are aware of the horizontal measures of the NDP including the Wider Equal Opportunities Principle. That is not to suggest that staff were unaware of the organisations' and their own obligations under the equality legislation. Interviewees were unanimous in their view that FÁS has made great efforts to ensure that its staff is aware of the equality legislation, which is far more persuasive than the principle, and that appropriate training is provided. Equally there was unanimity in relation to the progress the organisation has made on gender equality (both in its activities as a service provider but also as an employer) and the progress the organisation has made in adapting to its relatively new role in relation to training for people with disabilities. It was generally held that, over time, a greater consciousness would build in relation to issues arising under the other grounds of the equality legislation.

The view was also expressed both at Head Office and at management level in the training centres that equality needed to be directly and discretely resourced, particularly in relation to people with disabilities. If the achievement of equality is dependent on discretionary budgets and/or is in competition with other demands from the same budgetary source, it will be almost impossible to achieve. In the same vein, it was suggested that equality could be benchmarked with a view to rewarding innovation and inclusivity.

Those interviewed at Head Office and centre levels are positively disposed towards the concept of equal opportunities and the building of diversity although, in our view, that is predominantly understood in terms gender equality and the integration of people with disabilities.

7. Experiences of Managers and Course Instructors Concerning Persons from the Four Groups

Personnel within the training centres are favourably disposed to diversity and, every day, encounter a wide range of clients from different backgrounds and with differing abilities. That said, the changes in the client groups now encountered through the training centres presents challenges. According to training centre personnel, one of the current challenges they face related to the motivation of clients. Compared to seven or eight years ago when FÁS was dealing with a more highly educated group of people, the majority of SST clients are now generated through the NEAP process and are not, in general, as motivated or prepared as in the past. Also, because the Employment Service Officers rather than course instructors now interview prospective trainees and place them on waiting lists, the course instructor has no discretion over the make-up of classes. The instructors have no particular problem with this per se other than the fact that, because of the system, all individuals must travel through courses at exactly the same pace and this can be difficult if the class is particularly unbalanced in terms of ability, motivation or aptitude.

Both training centre management and instructors said that course structure is problematic. Trainees move in and out of courses as a block (e.g. 28 week course) regardless of their situation or background. Ideally, they claim, it should be possible for an individual to move at his/her own pace and complete a given course earlier or later as required.

Management in Jervis Street intends to pilot different approaches and methodologies to counteract this i.e. a blended learning experiment using a mix of approaches such as one-to-one tuition, group work, on-line tuition and lectures. They recognise that this will be difficult given rigidities in the system; however they believe it is necessary in order to ensure parity of outcome for all of their clients.

In relation to members of the groups covered under the WEOP principle the general view among staff at the training centres is that:

1. Older people attend SST courses and are generally considered to be a valuable addition to classes. Older people may start slowly, but once they have gained a foothold and build confidence they progress quickly though self-directed learning;

2. Travellers do not attend SST courses at the centres in question. Other than one comment that the Senior Traveller Training Centres should be closed to stop the *de facto* segregation, there were few considered views expressed regarding the absence of Travellers on SST courses. One training centre manager suggested that individual centres should perhaps create direct relationships with Traveller organisations to build trust and to persuade Travellers to attend in-centre training; however, this type of effort would require time and resources that are not currently available;

3. People from different ethnic backgrounds are not formally counted through the system but, particularly in Jervis Street, the presence of a wide ethnic mix was evident. Other than the fact that language can sometimes act as a barrier and that certain individuals can have a 'relatively loose interpretation of time', centre staff had no particular comments to make regarding this issue. They have dealt with a wide ethnic mix for a long time now and are not aware of any significant issues arising. However, as mentioned above, staff can find it difficult to secure a placement for individuals from particular ethnic minority groups, most particularly black Africans.

4. People with disabilities do not, generally, attend SST courses but, when they do, they are well received. That said, many of those interviewed believed that the capacity of the system to deal with even relatively modest numbers of people with disabilities is limited, primarily because of the absence of on-going dedicated budgets to ensure accommodation of special needs such as particular types of adaptive technology, sign-interpreters and other assistance.[2]

Staff noted that other rigidities in the system such as the timing of courses (i.e. 8.30am to 3.45pm) and possibly transport problems can create problems for prospective clients, including members of the four groups above.

Box 7.1: Summary of Main Experiences of Providing Training for Members of the Four Groups

Older People	The participation of older people in courses is valued. The attributes of maturity and life experience are seen as a stabilising influence on younger participants. Also, older participants are seen as making a valuable contribution to minimising bullying and harassment.
	Older people tend to be more highly motivated and, while tending to lack confidence in the early stages, more rapidly move into self-learning mode than most of their younger counterparts.
	One trainer said:
	'that age can affect the pace at which people travel but, once settled in, older people encourage balance and group integration. Any initial trepidation felt by older people is ameliorated by how they are initially treated – professional, polite and co-operative.'
	In one centre we visited, management provides the opportunity for prospective trainees to take a tour of the premises before actual start day. Older people tend to take up this offer and the experience is found to ease initial anxiety.
People with a Disability	The consciousness of disability issues within FÁS is very high, particularly given its expanded role in the area of training for people with disabilities since 2000. However, most people with disabilities are still trained through specialist sub-contractors outside of the FÁS training centre network.
	Very few people with declared disabilities present for SST and, according to one training centre manager, this can impact on the confidence and capacities of trainers to deal with people with disabilities "because they do not encounter enough" people with disabilities.
	It can also be difficult to ensure the availability of additional supports for people with disabilities and to secure on-going 'reasonable accommodation' such as dedicated sign language interpreters or other supports. As it stands, training centre management have certain limited discretion but decisions to fund high cost supports for possibly one person are weighed against the alternate use of available funds vis-à-vis the programme as a whole.
	As one senior manager put it:
	'If equal opportunities break the bottom line then it becomes a problem. What we need are dedicated budgets to resource equality at which point individuals or groups will not be seen as a problem. A question of this and that rather than this or that. A budget line for individual need would, by itself, greatly enhance planned progression.'
	That said, the participation in courses by people with disabilities is generally welcomed at the centres. Their participation is seen to be a positive experience for all concerned.
	Trainers noted that accommodating people with disabilities may require some additional allocation of their time but this has never stopped any of them from delivering the course although one trainer said that

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[2] It should be noted that an underspend of €10million has been incurred on SST as a result of a down turn in take-up. The corporate view is that there is adequate funding now available to deal with most contingencies. The point being made, however, is that there was and is no dedicated budget available to resource diversity.

Box 7.1: Summary of Main Experiences of Providing Training for Members of the Four Groups (Cont'd)

People with a Disability (Cont'd)	*'whereas before I may have pushed to get the maximum for the few, I now concentrate on achieving the minimum for all given the change in the composition of classes'*
	by which he meant that the educational qualifications of those now presenting as well as the diversity of those presenting, made the job of the trainer more challenging.
	Another trainer remarked that the question of disability is significant only where the disability impinges on the capacity of a person to do something rather than the disability itself. It was also suggested that there can be a difference between those who have an acquired disability as against those with congenital disabilities particularly from an attitudinal perspective.
	One trainer also told us that a trainee with a hearing impediment caused him to use a flip chart to explain things rather than simply talking at the class. The trainer found that the performance of all trainees improved as a result of this change in his approach and that he has stuck with this approach since that time.
	As evidenced by the above, adaptation to a diverse client group and/or the provision of reasonable accommodation need not always be a costly exercise. However, even where cost is an issue, the current €10m underspend on SST provides an opportunity to resource and engage with diversity in a manner that may not, heretofore, have been possible.
Members of the mainstream Traveller Community	Members of the Traveller community do not, in the main, present for FÁS courses. This in part relates to the fact that separate and distinct "training for Travellers" is available via the Traveller Training Centres and members of the community tend to gravitate towards that provision. Experience suggests that it may also relate to the fact that alternatives are not presented to members of that community who may not, as a consequence, be in a position to factor such provision into their options.
	One trainer who had previously worked with Travellers commented that he saw no difference in the capacity to learn and engage between members of the Traveller community and the settled community and that the maintenance of 'segregated' training created an inevitable stand-off that could be assuaged through closing down the separate Traveller provision.
	None of those interviewed were aware of any inherent barriers in the system to Traveller participation in SST and were of the view that no significant change would need to be made culturally or operationally to accommodate Travellers if members of that community presented.
	Most of those interviewed at Training Centre level suggested that there was a need for more pro-active engagement with the Traveller community.
Members of Minority Ethnic Group	Participants in this group are generally seen as being motivated and a useful addition to the mix in training courses. In as much as difficulties arise these are, it is suggested, as a result of the personality or attitude of particular individuals. In other words, no group related issues are identified as having arisen in any of the centres. Language can be a barrier in certain instances although in Jervis Street, Tallaght and Baldoyle, English as a Second Language for Industry and IT is provided to non-nationals in conjunction with the IILT, Trinity College.

8. Understanding the Framing of Policies and Practices Regarding Equal Opportunities in SST

The evidence from this study indicates that FÁS is securing the participation of older people on SST (average 13% per centre) and, anecdotally, we can confirm significant engagement with minority ethnic groups, particularly in the Dublin centres. There appears to be no particular issues arising in relation to these groups and, in fact, individuals from both groups are considered to add to class balance on the basis of maturity, motivation and other characteristics and attributes.

However, people with disabilities are poorly represented in SST within the centres visited and Travellers not at all. The existence of separate, 'specialised' training for both of the latter groups is a notable contributory factor to the absence of members of both groups from SST although, as discussed elsewhere, the reasons for non-participation by members of these groups are more extensive and include, for example, issues in relation to welfare entitlement and the relative rigidities in the timing and duration of SST provision (typically 8.30am to 3.45pm over 26/28 weeks).

FÁS has made a serious effort to ensure that the concept of being a disability-friendly service provider has been 'mainstreamed' among its staff, but the relative absence of people with disabilities amongst the trainee population tends to undermine that investment, depriving staff of the opportunity to interact with people with disabilities. In any event, it is of note that current policies and practices, including training of trainers in disability awareness and other issues, do not derive from a "formal" attempt to implement policies and practices arising from the application of the NDP's horizontal principle of equal opportunities across the EHRDOP and, by definition, to SST. These are located in a broader engagement with the equality legislation on the one hand and the operational realities encountered by the organisation on a day-to-day basis.

It is also worth noting that while training centre staff did not perceive there being significant issues pertaining to participation by members of the four groups once they turn up at a training centre, they did reference issues at either end of the training process. These have been referenced elsewhere in this study but bear repeating here:

- The system in place for the transfer of people onto SST courses works on a list basis following interview by the ESOs i.e. as places become available, individuals are referred to courses from the list. This can result in mixed ability class composition that, in it, is not problematic except that class size is usually standard (with no allowances made for participant mix) and all individuals must move through the system within the same time frame. This can, from time to time, stretch the resources of trainers and test their capacity to ensure that an equitable outcome is achieved for all.

- All SST courses involve an employment placement and, generally, this is achieved with little difficulty. However, in certain instances FÁS personnel have encountered unwillingness by employers to take on members of certain ethnic minorities, black Africans in particular.

Notwithstanding the fact that staff at training centres have a limited awareness of the existence of the horizontal principle and its application to their work, their practices are largely consistent with the outcomes sought by the application of the horizontal principle to SST inasmuch as they encounter members of the various groups in question. This is in large part due to the pervading organisational ethos, from top to bottom as we found it, stressing the availability of its services to all people who present. FÁS staff members have a very keen sense of the organisation's responsibilities, particularly to those who are marginalised on the labour market.

However, the fact that individuals who are members of certain groups do not present (e.g. Travellers and People with Disabilities) does not, in our experience during this study, give rise to sustained introspection within the organisation. In that regard it would appear to us that the pervading understanding of marginalisation and exclusion within the organisation relates predominantly to the concept of disadvantage alone (in particular educational disadvantage compounded by skill deficit) and not to disadvantage compounded by group membership. As such, at least some of the subtleties inherent in the equal opportunities argument may be under-estimated although, on the basis of this study, we are not in position to be definitive in this regard.

FÁS has traditionally been in the front line of encountering the effects of changes in labour market conditions. Currently, through the National Employment Action Plans (NEAPs) process and the consequent referrals from Employment Services, the three FÁS training centres we visited are encountering a relatively homogenous grouping i.e. in 2003 participants were predominantly young (under 25 years) and short-term unemployed. Across the measure taken at national level and covering all courses, participants are almost exclusively short-term unemployed (98.29% in 2003). The practical result of the organisation's facilitation of current policy is that the referrals into SST are standardised, leaving little room for people with disabilities or Travellers in particular. In addition, because resources are applied in pursuit of this policy, there is relatively little onus on or opportunity for FÁS itself to advertise and market its services more broadly, particularly within local communities and through voluntary and community groups, with a view attracting new or 'less typical' clients.

That said, because of the organisation's formal engagement with people with disabilities, the issues relating to that group of people and mainstream training are being increasingly focused on although the same cannot be said in relation to Travellers. As one interviewee noted, the process of accommodating diversity in its broadest sense will be gradual as people come to terms with the issues involved in much the same way that they had to come to terms with issues related to gender in the past.

9. Summary of Factors Conducive to Securing Equal Opportunities in SST

The following positive factors in relation to the accommodation of diversity in SST can be identified as operating intra-organisationally in the case of FÁS:

- The organisation's on-going commitment to equality as part-evidenced, for example, through its staffing of the Equal Opportunities and Social Inclusion Section;

- Its willingness to engage in equality-related work such as the equality proofing of Employment Services and its pro-active engagement with this study;

- Its ongoing ability to provide gendered data on membership of three of the four groups among its participants (minority ethnic status not captured);

- Its open recruitment process with no / minimal formal entry requirements;

- The positive attitudes of personnel toward accommodating diversity among course participants;

- The willingness of personnel to change their pedagogical approach in order to accommodate diversity; and,

- The willingness of personnel to make time in delivering courses for dealing with personal issues as presented by trainees regardless of group membership.

10. Lessons Arising from SST for Promoting Equal Opportunities

This measure study of SST has highlighted the important role played by the implementing agency in shaping the actual practices associated with implementing a measure. It also has shown how these practices can shape the profile of participants on a measure. In particular, it has shown that while the parameters of measure design have a bearing on "who participates" in a measure, practices regaring how the measure is promoted, the manner in which recruitment is undertaken, and the design and location of actual training provision can in large part be shaped by the implementing agency. In this regard, the organisational culture and commitment to equality and diversity of the implementing agency can be seen to play an important role in accommodating diversity on the programmes it provides.

The inter-relationship between the development of an active approach to accommodating diversity and the actual presence of diversity among measure participants is an important learning point arising from this study. In effect, the presence of diversity among participants on a measure, while being the outcome of practices conducive to this, must also be seen as a factor pushing the development of positive and active approaches to accommodating diversity.

Based on the typology of barriers to participating in labour market programmes presented in the report *Accommodating Diversity in Labour Market Programmes*, Box 10.1 identifies a number of the more practical learning points arising from this measure study of SST:

Box 10.1: Summary of the Learning Points Arising from the Measure Study of SST in Relation to Removing Barriers to Participation in Labour Market Programmes

Barriers to Participation in Labour Market Programmes	Learning Points from SST
Contextual barriers include prevailing labour market conditions and trends, the policy stance towards issues such as social exclusion, equality, and educational disadvantage, and the mix of programmes available as well as their target populations. They also include factors deriving from prevailing social attitudes and practices toward particular issues and groups of people. (Note: The latter when internalised can be viewed as dispositional barriers.)	FÁS is sensitive to the equality legislation and has made particular efforts regarding gender and disability, so much so that equal opportunities is, in our view, largely understood through these two grounds within the organisation.

The progress made in this regard displays the capacity of the organisation to absorb change and that flexibility is also evident in the manner in which the organisation caters to older people and minority ethnic groups.

However, as discussed above, the absence of people with disabilities and Travellers from SST courses is attributable to a number of factors including the availability of specialist and/or segregated training provision and, notably, the activation process under the NEAPs that tends to route a relatively homogenous population into SST.

The organisation is positively disposed towards dealing with any person presenting for training. The issue in relation to people with disabilities and Travellers as far as Training Centres are concerned is the fact that they do not present in the first instance and, particularly in relation to people with disabilities, the extent to which they can be systematically accommodated if and when they present. |
| **Institutional Barriers:** Institutional barriers concern factors related to the image, ethos, administration and practices of education and training providers. To a large extent these have evolved in the context of providing education and training | FÁS sees itself as an organisation essentially driven by equality and, in our experience, the organisation attempts to deal fairly and impartially with the diverse range of individuals it encounters. However, the extent to which the organisation, both at a policy level and operationally has internalised the subtleties of building diversity in the trainee population while recognising issues |

for young adults and only in more recent years have mainstream providers begun to consider how they might attract and cater for "non-standard" participants including members of the four groups being considered here.	associated with group identity is less evident. SST provision is standardised in terms of start times, duration of courses and so on and, through the activation process, the intake is relatively standardised. There is a need to consider the manner in which the institutional image and ethos of provision is developed and communicated in order to build diversity. In that regard, two of the centres we visited are developing promotional literature that aims to present their services in a more tailored manner to a broader as well as a more local public. This type of initiative will, in our view, serve to 'sell' the availability of the local package of services, including SST, more effectively and could have the potential to encourage 'less typical' users of the services to engage in recognition of the aspiration to have a service that is open to all.
Informational Barriers: The third set of barriers concerns information about education and training opportunities and related issues such as information on the relationship between education / training and outcomes such as securing employment, employment stability over one's labour market career, and potential income.	As above, the promotion of SST and other FÁS services is largely standardised and tends not to target particular groups and tends not to be tailored to local conditions. This is not to suggest that the national level infrastructure is deficient in itself but that there is an opportunity for complementary, more locally focused information provision and promotion of available services. In two of the three centres we visited, management is preparing documentation that will more directly present the services available locally and, in that context, there is an opportunity to ensure that accurate and tailored information is made available to different groups with a view to encouraging and facilitating their participation in existing provision. The development of direct working relationships between training centres and voluntary and community based groups working in their communities with or on behalf of various groups, including those covered under the WEOP, could also be act as a lever for change with the potential for encouraging more active participation by a disparate clientele including people with disabilities and Travellers.
Situational Barriers: Situational barriers such as lack of time, family/care commitments, and the cost of participation play an important role in restricting access to education and training among sections of the adult population. These barriers include what are termed participation costs and opportunity costs. The former are the additional expenditure incurred in participating – on transport, books and materials. The latter include foregoing the opportunity to earn income by taking up a place on a programme.	Training and other allowances including childcare allowances are provided. Additional supports to meet the needs of individual trainees are provided on a flexible basis at the discretion of training centre managers. This flexibility is used innovatively by centre management but their scope for manoeuvre is limited and sustained support for particular individuals or general support for a larger population, particularly of people with disabilities, is not possible. There is an awareness at all levels that equal opportunities needs to be effectively resourced in order to generate an environment that is more obviously amenable to members of the various groups such as the case of language provision for non-nationals that is available through Jervis Street. That said and as previously noted, the €10 million underspend on SST provides an opportunity to more comprehensively and strategically meet needs arising although the expression of such need is, in the first instance, dependent on the type and numbers of persons presenting for SST training.
Personal/Dispositional Barriers: The final set of barriers arises from personal/ dispositional factors. Included under this heading are demographics, particularly gender and age, initial educational levels, and a range of experiential, attitudinal and motivational factors.	SST does not specify minimum levels of formal educational qualification as an entry requirement and, as a result, any fear of 'failure at the first hurdle' that prospective trainees may have is appeased. The current assessment system is consciously designed to remove barriers to participation and to avoid any tendency to 'cherry-pick'. This system could be enhanced further through more intensive engagement between Employment Service Offices and Training Centres in planning for the accommodation of diversity

Box 10.1: Summary of the Learning Points Arising from the Measure Study of SST in Relation to Removing Barriers to Participation in Labour Market Programmes (Cont'd)

	rather than the more reactive approach that can currently arise in the Training Centres because of the 'separation of powers' between the two aspects of the overall FÁS service. The equality proofing exercise engaged in by the Employment Service and the proposed equality proofing of training services provides an opportunity to build linkages to encourage more effective and planned accommodation of diversity.

11. Conclusions

11.1 Understanding the WEOP and Related Issues

FÁS does not have a stand-alone, over-arching Equality Statement. Rather, FÁS expresses its commitment to equality policies and practices through a range of corporate documentation including, for example, its:

- Strategy Statement – where it states that FÁS will:

  "continue to ensure that equality of opportunity is available for all, by a specific focus on special target groups of people, where necessary, and the promotion of more non-traditional training and employment opportunities for women", and its;

- Customer Charter – where, specifically in relation to equality, it states that:

  "services will be provided to all customers in a courteous, fair and impartial manner and in full compliance with all equality legislation. Facilitate access to FÁS services for people with disabilities."

Additionally, the FÁS intranet system provides Good Practice Guidelines on Equal Opportunities aimed at supporting staff in dealing with clients from an equality perspective and explaining their responsibilities under existing equality legislation. Consistent with this, equality has been incorporated into on-going staff training and development; for example, in the inclusion of Equality Matters into the Certificate in Training and Continuing Education provided through NUI Maynooth. FÁS, in association with NUI Maynooth, has also developed a Certificate in Equality Studies in Training and Development that will be piloted in late 2004 and/or early 2005.

We also noted that FÁS has carried out an Equality Proofing Pilot Project through its Employment Services with a view to proactively enhancing its capacity to be the leading Irish state agency in achieving equal access, participation and outcomes for the nine groups covered under the equality legislation so that the conditions of those groups who currently experience inequality in Ireland are substantially improved. It is also the case that FÁS's efforts have focused on raising awareness and developing competence in relation to gender and disability arising from the broad thrust of its gender mainstreaming policy and the organisation's recent remit in the area of providing training for people with disabilities. Against that backdrop, we are of the view that the corporate understanding of the issues arising in relation to accommodating members of minority ethnic groups, Travellers and older people among its trainee population is less formally developed.

Overall, however, on the basis of our study of corporate and other documentation it is evident that FÁS is pro-active in its attempts to develop a consciousness of equality matters across and within the organisation and that this now provides a platform for its capacity to effectively engage with the WEOP.

11.2 Existing Practices and Barriers Regarding the Application of the WEOP

Over the course of the study, we found that the treatment of people from within the groups covered by the WEOP was equitable and fair inasmuch as they were referred by Employment Services to the three centres in question under the SST measure.

It is important to note that the study concentrated on the operation of the Measure alone (i.e., the design and delivery of SST within training centres) and did not extensively examine or engage with the process prior to referral (as operated by Employment Services) or the placement process subsequent to the training intervention. Nor did the study engage with Community Services and its range of

programmes for disadvantaged groups – many of these programmes are available on a part-time and localised delivery basis. What is of note, however, is that Employment Services engage in relatively little formal assessment of prospective trainees in respect of most SST provision and formal educational qualifications are not required. Instead, prospective trainees must meet broadly defined standards. This practice means that there are no credential related, arbitrary, or artificial barriers in place to obstruct participation in SST.

Despite the apparent openness of the criteria for referral to SST, our analysis of the national participation rates in SST for 2002 and 2003 as well as our analysis of 2003 SST participation rates in the training centres that are the subject of this study shows that:

- SST caters to a relatively homogenous group and in particular to relatively young, short-term unemployed people;

- Older people (aged 45+) are referred and do participate (an average of 13% of 2003 participants in SST provision at the 3 centres under study);

- People who declare a disability on registration are rarely referred or participate on SST (an average of 2.6% of 2003 participants in SST provision at the 3 centres under study);

- Travellers are rarely referred to or participate on SST (there were no Traveller participants in SST provision in 2003 at the 3 centres under study); and,

- Members of minority ethnic groups participate in SST but data relating to the rate or level of participation is unavailable.

Thus, it would appear that the relatively homogenous profile of participant on SST is a function of a prioritisation of NEAPs clients by Employment Services (i.e. such clients are predominantly referred to SST). As noted elsewhere in this report, the Employment Service Officers have four priority groupings that include NEAPs clients, LES clients, Special Needs clients and a fourth category comprised of Travellers and Ex-offenders. From the WEOP perspective and based on the evidence of this study it is clear that the referral system is not functioning adequately in relation to Travellers and people with disabilities at least. We are unable to determine adequacy in relation to members of minority ethnic groups because data is not reported in relation to this group.

The non-referral of individuals in this regard clearly impacts on the capacity of Training Services to deliver SST with a view to achieving equal access, participation and outcomes for at least some of the groups covered under the WEOP. It also means that Training Service personnel, despite on-going training, particularly in relation to people with disabilities, have little opportunity to interact with members of that group and, as evidenced by the data, have practically no opportunity to interact with Travellers.

It should be noted however that, in our consultation with FÁS concerning this report, the Employment Services representative present noted that a new quarterly recruitment system is to be introduced (October 11th, 2004) and that the new system together with the new registration system may have an impact on this situation.

The availability of funding resulting from the €10 million underspend on SST also provides an opportunity to redress the imbalance with a view to recruiting, supporting participation and achieving equitable outcomes for members of the groups currently under-represented in the participant profile.

11.3 How Equality Practices can be Incorporated into the Design and Delivery of Programmes

As noted throughout this report, FÁS takes its obligations under the equality legislation very seriously and provides training and other supports to its personnel on an on-going basis. In that regard the organisation is well prepared to engage with the WEOP.

Furthermore, there is nothing inherent or intrinsic in the design and delivery of SST within the training centres that impedes participation with the possible exception of the lack of a dedicated equality / diversity budget to promote the recruitment of and support to atypical clients.

As noted in Section 11 above, this study shows that while the parameters of measure design have a bearing on "who participates" in a measure (in this case SST is technically open to all and there are no measure specific criteria that actively block participation), practices regarding how the measure is promoted, the manner in which recruitment is undertaken, and the design, location, and timing / duration of actual training provision can in large part be shaped by the implementing agency. With regard to these implementation parameters, FÁS could more actively promote its full range of services to all clients and, where necessary, resource their participation through the systematic provision of whatever reasonable accommodation or additional supports are necessary. This would have the effect of building the actual presence of diversity among measure participants which, in turn, reflects on organisational commitment, learning and, critically, organisational culture and competence. As noted earlier, the presence of diversity among participants on a measure, while being the outcome of practices conducive to this, must also be seen as a factor pushing the development of positive and active approaches to accommodating diversity.

The sole issue that arose in relation to SST over the course of the study concerns the fact that all participants, regardless of background or ability, must go through the various SST courses at the same pace. With regard to this, some flexibility in delivery mode and/or duration would assist in easing the pressure on certain participants to perform to an inappropriate norm (not necessarily and/or not alone for trainees covered by the WEOP) thereby making SST provision a more realistic option for more people.

Finally, and in respect of actions to strengthen organisational capacity to engage with the WEOP, FÁS should build on existing practice and developments in securing equality. In this regard, the provision of information that explains the WEOP and that distinguishes between the avoidance of discrimination and the pro-active pursuit of equality/diversity would be valuable. Through its on-going work programme, the ESU could be of assistance in this regard.

Equality Studies Unit
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