REPORT TO:	CABINET 12 October 2022
SUBJECT:	South London Work and Health and Job Entry Target (JET) Programme Extension/Variation
LEAD OFFICER:	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration and Economic Recovery Heather Cheesbrough, Director of Planning and Sustainable Regeneration
CABINET MEMBER:	Councillor Jeet Bains, Cabinet Member for Planning and Regeneration.
WARDS:	All

## FINANCIAL IMPACT

Additional funding of £3,502,023.36 from the Department of Work & Pensions (DWP) will be allocated to WHP and JETS as follows:

- £3,202,023.36 to WHP to extend the programme by a further twenty-three months from October 2022, meaning referrals to the programme will continue until September 2024.
- £300,000 to JETS to bolster the programme and deliver more employment outcomes due to the success and overperformance of the contract to date.

The programme will require legal fees to initially come from Council budget, this cost will then be shared proportionally between all the five South London Partnership boroughs. (As an indication of legal expenses for the programmes, JETS legal costs to date total  $\pounds7,557.50$  of this total Croydon will be responsible for 42% to the value of  $\pounds3,174$ ).

**FORWARD PLAN KEY DECISION REFERENCE NO.: 5322EM** The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

# 1. For CCB

The Contracts and Commissioning Board (CCB) is requested to approve the recommendations in this report to the Mayor in Cabinet:

1.1 Approve a variation of the contract between the London Borough of Croydon (as Lead Accountable Body on behalf of the South London Partnership) and Reed in Partnership ("Contract") in order to:

- a) extend the term of the Contract for the continued delivery of the South London Work and Health Programme (WHP) which also incorporates the Job Entry Targeted Support (JETS) Programme, until 30<sup>th</sup> November 2026 (referrals for WHP until September 2024 with a tail off period until 30<sup>th</sup> November 2026 and referrals for JETS until September 2022 with a tail off period until April 2023).
- b) increase the Contract value from £20,015,610 to incorporate DWP funding of £3,202,023.36 in respect of WHP and £300,000 for JETS, for a new aggregate contract value of £23,517,633.36

The Executive Mayor has the power to make the decisions set out in the recommendations below:

## 1.3 DRAFT RECOMMENDATIONS

The Executive Mayor, in Cabinet, is recommended to:

1.4 Approve a variation of the contract between the London Borough of Croydon (as Lead

Accountable Body on behalf of the South London Partnership) and Reed in Partnership ("Contract") in order to:

a) extend the term of the Contract for the continued delivery of the South London Work

and Health Programme (WHP) which also incorporates the Job Entry Targeted Support (JETS) Programme, until 30<sup>th</sup> November 2026. This means the

referrals for WHP will continue until September 2024 with a tail off period until 30<sup>th</sup> November 2026 and referrals for JETS until September 2022 with a tail off period until April 2023.

 b) increase the Contract value from £20,015,610 to incorporate DWP funding of £3,202,023.36 in respect of WHP and £300,000 for JETS, for a new aggregate contract value of £23,517,633.36.

# 2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to seek approval of the recommendation to vary the existing Contract with Reed in Partnership for the continuation of the WHP until 30<sup>th</sup> November 2026 and to increase the aggregate value of the Contract to include DWP funding of £3,202,023.36 in respect of WHP and £300,000 for the JETS Programme (the latter programme having been included via previously agreed variations to the Contract).
- 2.2 As the lead accountable body on behalf of the five South London Partnership boroughs, the Council was awarded £13.385,684 funding from DWP and the European Social Fund (ESF) to deliver the South London Work & Health Programme for 5 years from January 2018 to 2023 for a contract value of £13,385,684. Following a competitive dialogue procurement process, the contract was awarded to Reed in Partnership to deliver the WHP for an initial five-year period with two-year extension options. The content of the original award report was endorsed by the Contracts and Commissioning Board on 3rd November 2017 (Ref: CCB1285/17-18) and approved by Cabinet (ref: 2017CAB). Whilst it reflected the contract term of 5 +2 years, the award value of £13,385,684 in those reports appears to have mistakenly not take into account

the extension option. The reports should have stated a maximum contract value of  $\pounds$ 17m inclusive of the extension option. It is not clear why this error occurred. The contract award notice did however reflect the additional term and a contract value of  $\pounds$ 17m, which would have covered funding for WHP for the additional two years.

- 2.3 Since then, the Contract has been varied twice with approval from Cabinet (Refs 2620CAB; 4021CSBR). Firstly, to (respectively) incorporate the JETS programme to the value of £3.47m from Oct 2020-2021, Secondly, to include additional top up funds (£820k) for services exceeded in light of Covid and an extension to JETS for a further 1 year from October 2021 to September 2022 at a value of £2.364m. This increased the value of the Contract to £20,015,610. Both variations relied on Regulations 72 (1) (c) of the Public Contracts Regulations 2015 which permits variation due to unforeseen circumstances, in this case, the Covid pandemic.
- 2.4 This report recommends approval of the variation in order to utilise DWP funding in the sum of £3,202,023.36 for the additional referrals over 23 months from October 2022 to September 2024 in respect of WHP. The Contract provides for expiry 791 days after the last referral. This would lead to a Contract end date of 30<sup>th</sup> November 2026. Since this exceeds the permitted extension period of two years, approval is required for the additional contract term.
- 2.5 The report also recommends approval to include within the increased Contract value additional funding of £300,000 from DWP to deliver additional outcomes through the JETS programme. This will bring the total contract value to £23,517,633.36.

### Detail

- 2.6 The Job Entry Targeted Support (JETS) Programme was introduced as a response to Covid-19 which had an unprecedented impact on unemployment and inequality. The JETS programme was intended to provide light touch, short term support to up to 3,520 residents from the five SLP boroughs, who had become newly unemployed as a result of Covid-19.
- 2.7 In September 2020 the contract variation to the South London Partnership (SLP) WHP contract held with Reed in Partnership was endorsed by the Contracts and Commissioning board Ref: CCB1607/20-21 and Cabinet ref: 2620CAB to accommodate a separate employment strand Work & Health Programme Job Entry: Targeted Support (WHP JETS) for a 12-month period starting in October 2020 for the value of £3,465,926.
- 2.8 Due to the demand being greater than anticipated, Reed in Partnership received an additional £3.164,000 from DWP to continue the programme for a second year on behalf of the South London Partnership for the continuation of the JETS programme A Cabinet Member variation report was approved by the Contracts and Commissioning board ref: (CCB ref: 1607/20-21) for a further 1 year from October 2021 to September 2022:, at a value of £2,364,000 as a permitted modification under the Public Contracts Regulations 2015 72 (1) c.

- 2.9 The SLP Work and Health Programme was awarded for £17m (though the Cabinet approval was for £13,385,684) jointly funded via DWP and ESF for 5 years from January 2018 to 2023 with an option to extend for a further 2 years. A modification to the contract with Reed in Partnership to include the addition of WHP JETS additional service increased the value of the contract to £20,015,610.
- 2.10 The report recommends Executive Mayor approval of £3,202,023.36 for DWP funding and an extension to South London WHP alongside an additional £300,000 DWP funding for the JETS programme.
- 2.11 The additional funding from DWP will increase the total contract value to £23,517,633.36 over the full-term contract term.
- 2.12 The variation to the contract to date as follows:

	JETS							
Sep-20	Original Value	£3,465,926.00						
Sep-21	Additional funding 21/22	£800,000.00						
Sep-21	1 <sup>st</sup> Extension Contract Value	£2,364,000.00						
Nov-22	Additional funding 22/23	£300,000.00						
	Total	£6,929,926.00						

	WHP							
		£13,385,684.00						
		(Contract award						
Mar-18	Original Value	notice £17m)						
Oct-22	Extension Contract Value	£3,202,023.36						
	Total	£16,587,707.36						

2.13 The Work and Health Programme has supported 5616 residents across the five South

London Partnership boroughs since the start of the Programme in March 2018, with over 1900 residents being placed into work (up to the end of July 2022). Additional funding would allow a further 1510 individuals to start the programme.

2.14 It will be delivered via the same Grant Funding mechanism as the core Work & Health Programme, which will form the basis of the formal agreement between DWP and each Local Growth Partnership for their responsibility for the delivery of WHP JETs. The Grant Funding will be solely from DWP and there will be no ESF funding.

### Background

2.15 The South London Work and Health Programme is intended to support up to 5582 residents of Croydon, Merton, Kingston, Sutton, and Richmond into sustainable employment, targeting residents with disabilities and/or health conditions, the long term unemployed and specified disadvantaged groups.

- 2.16 The funding for the Programme is being derived from a £6,690,000 grant from the Department of Work & Pensions (DWP) for the initial 5-year period of the Programme. The grant value of £6,695,684 was match funded by the European Social Fund (ESF) providing a total budget of £13.385,684 for the Programme's initial 5-year period. The funding was approved due to the DWP's devolving powers and funding to London sub-regions which enables Croydon as the Lead Authority to receive the funding on behalf of the South London Partnership boroughs.
- 2.17 The programme is funded externally through grants from the Department for Work and Pensions (DWP) and the European Social Fund (ESF). The funding was approved due to DWP devolving limited authority and funding to London sub-regions which enabled Croydon as the Lead Authority to receive the funding on behalf of the South London Partnership boroughs. The DWP grant and ESF match funding provided a total budget of £13.385,6840,000 for the programme's initial 5-year period and subsequent addition funding provided to incorporate JETS and to further extend the contract with Reed In Partnership.
- 2.18 The programme has been particularly beneficial to Croydon residents with the borough having 2478 programme starts (44%) and 837 job starts (43%).

## 3. WORK AND HEALTH PROGRAMME

- 3.1 The South London Partnership is a sub-regional collaboration of five South London Boroughs: Croydon, Kingston, Merton, Richmond upon Thames, and Sutton. Working together and with partners, building on many years of collaborative working. SLP brings an integrated approach which adds value to what individual boroughs could achieve on their own, whilst seeking to build on the many strengths of South London as a place to live, work and thrive.
- 3.2 Croydon is the lead accountable body for the Work and Health Programme and JETS on behalf of the SLP and will be responsible for the management of the programmes.
- 3.3 The Work and Health Programme was initially introduced as a 5-year programme, providing tailored support to residents from disadvantaged backgrounds, such as people with disabilities and health conditions and the long term unemployed.
- 3.4 Along with Greater Manchester, London received devolved funding from DWP for the Work and Health Programme, which facilitated a more integrated approach, allowing residents to access relevant support services such as financial support or training and employment opportunities. This integrated approach has enabled Council services, such as Housing and Croydon Works to refer candidates to the programme, allowing them access to tailored support.
- 3.5 This integrated approach also allows us to work in partnership with external support services who have historically had a presence in the borough such as MIND and Croydon IAPT. This enables a holistic programme of support to residents and draws on the expertise of local provisions.

3.6 After an initial slow start (exacerbated by the effect of Covid - 19) the contract has seen an upturn in performance over the last year:

	Contract 100%	Croydon (42%)	Sutton (17%)	Merton (17%)	Richmond (12%)	Kingston (12%)
Referrals Actual	10687	4936	1381	1779	1317	1110
% of Total	100%	46%	13%	17%	12%	10%
Starts Actual	5616	2476	844	972	644	628
% of Total	100%	44%	15%	17%	11%	11%
Job Entry Actual	1925	839	325	325	222	200
% of Total	100%	44%	17%	17%	12%	10%
Lower Job Outcome Actual	1132	475	191	203	127	128
% of Total	100%	42%	17%	18%	11%	11%
Higher Job Outcome	_					
Actual	834	335	143	152	104	94
% of Total	100%	40%	17%	18%	12%	11%

\*Figures cover the period March 2018 – July 2022

The Tables below sets out the total value of the funding for the South London Work & Health Programme and for JETS, broken down by borough, based on the expected level of benefit to each borough:

	Contra	act 100%	Croyo	ion (42%)	Sutton	(17%)	Merto	on (17%)	Richmo	ond (12%)	Kingston (	12%)
Original Contract Value	£	13,385,684	£	5,621,987	£	2,275,566	£	2,275,566	£	1,606,282	£	1,606,282
Extension Value	£	3,202,023	£	1,344,850	£	544,344	£	544,344	£	384,243	£	384,243
Total Value (excluding M&A funding detailed below)	£	16,587,707	£	6,966,837	£	2,819,910	£	2,819,910	£	1,990,525	£	1,990,525
Management & Admin funding from ESF to cover LBC's staffing costs to Contract Manage the	£	866,061	£	866,061		N/A		N/A		N/A		N/A

#### South London Work & Health Programme

Programme (actual costs form 17/18 – 21/22, forecast for 22/23).								
Management & Admin funding from DWP to cover LBC's staffing costs to Contract Manage the extension	£	981,503	£	981,503	N/A	N/A	N/A	N/A

#### **Job Entry Targeted Support**

	Contr	act 100%	Croy	rdon (42%)	Sutton	(17%)	Mert	on (17%)	Richm	ond (12%)	Kingston	(12%)
Original Contract Value	£	3,465,926	£	1,455,689	£	589,207	£	589,207	£	415,911	£	415,911
Additional Funding 21/22	£	800,000	£	336,000	£	136,000	£	136,000	£	96,000	£	96,000
Extension Value	£	2,364,000	£	992,880	£	401,880	£	401,880	£	283,680	£	283,680
Additional Funding 22/23	£	300,000	£	126,000	£	51,000	£	51,000	£	36,000	£	36,000
Total Value	£	6,929,926	£	2,910,569	£	1,178,087	£	1,178,087	£	831,591	£	831,591

- 3.7 An extension would allow an additional 1510 SLP residents to receive the support of the programme.
- 3.8 The proposal presented before the Executive Mayor is to seek approval for a further variation of the contract with Reed in Partnership to increase the contract value in respect of WHP by an additional £3,202,023.36 and exercise the two-year contract extension. (Excluding JETS).
- 3.9 All management and administration costs would be utilised through the funding with only legal costs being spent from council budget.
- 3.10 It was agreed a variation to the existing contract is the most appropriate route given the strong performance from the existing contractor, Reed in Partnership. Furthermore, the short timescales set by DWP and the need to ensure uninterrupted delivery mean a new procurement would not be viable and support the delivery of the service.

### 4 JOB ENTRY TARGETED SUPPORT (JETS)

- 4.1 The SLWHP JETS programme was introduced for an initial period of 1 year, to respond to the impact of the Covid-19 pandemic and complement the existing WHP programme with the same core objectives.
- 4.2 The aim of the programme is to support people who have been newly unemployed and in receipt of benefits for at least 13 weeks to a year as a result of Covid-19, to find sustainable work.
- 4.3 Due to the ongoing challenges of Covid, the Programme was extended for a second year but will not be extended beyond this. However, due to

overperformance, DWP has allocated £300,000 of additional funding to deliver additional outcomes within the existing contract period.

In broad principles the SLWHP JETS has:

- Provided a light touch provision that includes, but is not limited to, transferable skills analysis, CV writing, job search support, interview skills, self-efficacy, and confidence building.
- Been delivered and managed separately from the core WHP programme.
- 4.4 To date JETS has seen 6167 residents start the programme with 2225 placed into employment.
- 4.5 The second year of JETS has seen job entry sustainment's reach 204% against profile.
- 4.6 Programme starts for the second year reached the contracted target of 2400 at the beginning of August 7 weeks ahead of schedule. This has caused us to reach the funding ceiling much earlier than anticipated for the second consecutive year.
- 4.7 An extra £300,000 of funding has been provisionally confirmed (subject to DWP governance) by the DWP to allow the programme to support an additional 412 people into employment.

## 5. CONSULTATION

- 5.1 All South London Partnership boroughs have been consulted in regard to additional funding for an extension to the Work and Health Programme and agreement in principle was obtained from all SLP Growth Directors, prior to DWP confirming allocations and volumes. Since DWP confirmed the allocation, a further update was provided to the Growth Directors at their meeting on 12<sup>th</sup> September 2022. [Formal written approval shall also be sought prior to implementing the extension]. Further updates will be provided as and when necessary, at scheduled monthly meetings.
- 5.2 Each of the five South London boroughs nominated Lead Officers have been involved and contributed to this process throughout.
- 5.3 Wider Work and Health Programme sub regions (including Central London Forward and West London Alliance) have been consulted in regard to their plans for a WHP extension and all are in agreement in regard to varying their contracts.

## 6 PRE-DECISION SCRUTINY

6.1 This item has not been to scrutiny meeting for a pre-decision due to the urgent measures needed to ensure the programme can continue with the additional funding.

## 7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

	Current year	Medium Term Financial Strategy – 3 year forecast						
	2022/23	2023/24	2024/25	2025/26				
	£'000	£'000	£'000	£'000				
Revenue Budget available								
Expenditure	4,575,000	0	0	0				
Income	(4,575,000)	0	0	0				
Effect of decision from report								
Expenditure	£523,984	£1,102,569	£1,326,553	£503,175				
Income	£523,984	£1,102,569	£1,326,553	£503,175				
M&A Funding Legal Costs*	£236,676 £ 7,558	£ 248,276	£ 244,409	£244,409				
Remaining budget	0	0	0	0				
Capital Budget available								
Expenditure Effect of decision from report	0	0	0	0				
Expenditure	0	0	0	0				
Remaining budget	0	0	0	0				

#### 7.1 Revenue and Capital consequences of report recommendations

\*Legal costs are an estimate based on JETS legal costs to date.

### The effect of the decision

The effect of the decision is the Council will commit to spending an additional  $\pounds$ 3,202,023.36 on the Work and Health Programme for a twenty-three month extension and allowing 1510 more SLP residents to start the programme. The Council will also commit to spending an additional  $\pounds$ 300,000 on the JETS programme to support an additional 412 SLP residents into employment. All additional spend will be paid to the Council in the form of grant funding from the DWP. A small cost will be shared between the five SLP boroughs for any legal costs involved during the programme which will be contained within other Economic Development Budgets. (As an indication of legal expenses for the programmes, JETS legal costs to date total  $\pounds$ 7,557.50, of this total Croydon will be responsible for 42% to the value of £3,174).

### Risks

This is set out in Part B of the report as it includes legal professional privilege information

## 7.3 Options

The following alternative options were considered and rejected due to the negative impact on performance and support available to residents.

The option of re-procuring was considered but due to the short-term nature of the extension it was felt that there would be minimal interest from the market given the length of time and investment that would be required from a new provider. Additionally, the adjustment time that a new provider would need, would lead to a dramatic drop off in performance, meaning the required number of employment outcomes would not be achieved within the necessary timeframe. Furthermore, a re-procurement would lead to a break in delivery, which would adversely affect vulnerable residents in need of support and would contravene DWP's stipulation that there should be no break in delivery.

The option of rejecting the opportunity of additional funding was considered but would result in a lack of support for SLP residents.

### 7.4 Future savings/efficiencies

This extended provision of support will maximise employment opportunities for local residents and support the Council in delivering value for money in performance, delivery, and cost.

The Work and Health Programme allocated 30% in value £981,503 of additional funding to cover costs in relation to management and administration, this could be used to support procurement expenses as staff costs were covered through the original funding.

As the expenditure will be covered from DWP grant funding, there are no saving opportunities. A small cost will be shared between the five SLP boroughs for any legal costs involved during the programme.

Approved by: Darrell Jones, Acting Head of Finance – Sustainable Communities, Regeneration & Economic Recovery 31<sup>st</sup> August 2022.

## 8. LEGAL CONSIDERATIONS

- 8.1 The Head of Commercial & Property Law comments on behalf of the Director of Legal Services & Monitoring Officer as follows:
- 8.2 The Council may enter into contracts and variations of contracts under the general power of competence (Localism Act 2011), which gives local authorities the power to do anything that individuals generally may do.
- 8.3 The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000.
- 8.4 The original Cabinet award report should have included the full value of the permitted extension (plus 2 years) of the WHP programme i.e. £17m. It is understood that this omission appears to have been a mistake. Although the original Cabinet award report omitted the extension value, the contract award notice and the contract covered the 5+2 years and the full value for WHP.

Therefore, the recommendation to extend WHP contract value by £3,202,023.36 is not a variation within the Public Contracts Regulations 2015.

- 8.5 The Council must comply with the Public Contracts Regulations 2015 (PCR). Regulation 72 of the PCR sets out a number of 'safe harbours' which can be used to modify a contract during its term. As stated above, the previous variations were made pursuant to Regulation 72 (1) (c) which permits variation due to unforeseen circumstances. For these variations, the Council is required to publish modification notices.
- 8.5 This report recommends a further variation to JETS to include additional funding of £300k. This can be considered to be a non-substantial variation pursuant to Regulation 72(1)(e) as it does not meet any of the criteria of a substantial variation contained within 72(8) of the PCR. In order to rely on this provision, the value of the modification does not need to be aggregated with previous modifications and no notice is required.
- 8.6 The Council is under a general Duty of Best Value to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness (Section 3 of the Local Government Act 1999 (as amended by s137 of the Local Government & Public Involvement in Health Act 2007).

Approved by Kiri Bailey, Head of Commercial and Property Law, on behalf of the Director of Legal Services & Monitoring Officer.

### 9. HUMAN RESOURCES IMPACT

- 9.1 The original funding for WHP allocated 10% of total funding towards funding management and admin costs in relation to management of the programme.
- 9.2 Agreement has been given for local administration costs equating to 23% of the total funding to be allocated towards funding the management and administration of the programme. Any staff employed to oversee the programme will be a council employee on a fixed term contract.
- 9.3 There will be an HR impact in regard to this report, in terms of when any staff member's fixed term contract comes to an end. The post holder may be entitled to a redundancy payment and redeployment.
- 9.4 If any other issues arise these will be managed under the Council's policies and procedures.

Approved by Jennifer Sankar, Head of HR for Sustainable Communities, Regeneration and Economic Recovery, for and on behalf of Dean Shoesmith, Chief People Officer. August 2022

## 10. EQUALITIES IMPACT

- 10.1 The council has an obligation under the public sector equality duty, which is to eliminate unlawful discrimination, to advance equality of opportunity and to build better relationships between groups with protected characteristics.
- 10.2 An equality analysis was completed in August 2020 as part of the initial contract variation and was signed off by the Equalities Manager.
- 10.3 The outcome is no major change; the Equality Analysis demonstrates that the policy is robust and that the evidence shows no potential for discrimination and that all opportunities to advance equality have been taken.

# Approved by Gavin Handford, Director of Policy, Programmes & Performance

## 11. ENVIRONMENT AND CLIMATE CHANGE IMPACT

11.1 With the original contract, Reed in Partnership was required to create, submit and maintain a Sustainable Development implementation plan. The plan covers various areas such as minimising waste, energy efficiency, reducing transportation/travel and staff awareness training. That plan applies to this strand.

## 12. CRIME AND DISORDER REDUCTION IMPACT

12.1 There are no adverse Crime and Disorder impacts arising from this report. The expected increase in number of residents becoming employed will have a positive impact across the boroughs potentially reducing crime and disorder within the borough.

## 13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 13.1 The success of both the Work and Health Programme and JETS has highlighted the demand for this type of support, by continuing extending these programmes we would be able to support the London recovery mission of 'good work for all'.
- 13.2 The original WHP funding was aimed at supporting 2510 SLP residents into employment. By increasing the funding, we will be able to increase the number of residents who are supported into employment.

### 14. OPTIONS CONSIDERED AND REJECTED

14.1 Two further options were considered.

**Option One**: Procure a new provider – this was not a viable option as the programme is well established and the current provider has integrated the programme into the South London area, focusing on a locality approach that

would take at least 18 months to replicate. A change in the provider would be at the detriment to the participants of the programme.

**Option Two**: Do not extend the programme – this would leave a gap in employment support for those participants who were further away from employment and therefore not acceptable.

These options were deemed not acceptable and rejected. This has been done with extensive consultation with legal and procurement colleagues and other Work & Health Contract Managers across London.

#### 15. DATA PROTECTION IMPLICATIONS

#### 15.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

**YES** - Any data shared between Reed in Partnership, the Council and SLP is anonymised and therefore does not include any personal data.

This is a contract variation and the contractor processes personal data. There is existing detailed governance and approved protocols around GDPR.

Reed in Partnership have confirmed the same protocols will apply.

# 15.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

YES

A DPIA assessment was completed when the programme was initiated.

(Approved by Heather Cheesbrough, Director of Planning & Sustainable Regeneration)

**CONTACT OFFICER:** Gurvinder Doal, JETS Project Manager Kate Apted, Work and Health Programme Manager

### **APPENDICES TO THIS REPORT – CABINET REPORTS**

