



**MAYOR OF LONDON**



Leading learning and skills

**LONDON REGION**

**ESF Train to Gain**

**SPECIFICATION QUESTIONNAIRE**

**TENDER REF: GL.ESF.TtG**

## **SECTION 1 – BACKGROUND**

Train to Gain was established as a national skills service to support employers of all sizes and in all sectors to improve the skills of their employees as a route to improving their business performance. It is a commitment to jointly invest in training, by employers and Government.

In return for that commitment, employers can expect that Train to Gain will give them access to:

- Quality assured advice in identifying skills needs at all levels, from skills brokers and training providers with expertise in their area of business;
- Help to identify and source high quality training and qualifications to meet those skills needs;
- An expert who will pull together a skills solution package which may include government training subsidies, alongside the employer's own financial contribution;
- For those making the Skills Pledge, follow up advice and support that is fully integrated within the Train to Gain Service;
- An integrated business and skills brokerage service managed by the London Development Agency.

Plan for Growth was introduced in November 2007 to respond to employer demand for flexibility in several areas. The Skills Brokerage remit was changed to permit engagement with all organisational sizes and changes to learner eligibility.

In July 2008 further flexibilities were announced as part of a review of Train to Gain. Additional provision, where learners already held similar qualifications, was permitted.

In December 2008, in response to the economic downturn, a range of flexibilities have been permitted specifically aimed to support SMEs.

The success of Train to Gain – to enable employers to successfully meet their current and future skills requirements – will rely on a commitment from employers to jointly invest in training with Government.

### **AIM**

In order to meet the expected employer demand (including additional demand that may be generated by LSC-funded activity in London in response to the economic downturn, as described in the London Joint Action Plan), this specification aims to procure additional Train to Gain activities for London.

### **SERVICE REQUIREMENT**

Whilst the normal Train to Gain funding criteria will still apply, the following flexibilities, which are different to the core Train to Gain offer, can be applied to this ESF specification:

- First or repeat full Level 2 qualifications which are currently eligible for employer responsive funding via Train to Gain – however, the restrictions around the qualifications identified for full Level 2 repeats will not apply and so providers may deliver repeat qualifications in any sector.
- First or repeat full Level 3 qualifications which are currently eligible for employer responsive funding via Train to Gain – however, the restrictions around the qualifications identified for full Level 3 repeats will not apply and so providers may deliver repeat qualifications in any sector. **NB: Employer contributions will apply to some employees (see below).**
- Full Level 4 qualifications which are eligible for employer responsive funding can be funded for learners who already have a Level 3 (currently Train to Gain only funds these for Level 3 ‘jumpers’). **NB: Employer contributions will still apply to some employees (see below).**

Please refer to the [LSC Funding Guidance 2008/09 Funding Rates](#) document for further information on employer contributions and to the [LSC Funding Guidance 2008/09 - Learner Eligibility Guidance](#) paragraphs 96–97 for guidance on whether learners will be fully funded or co-funded. The funding rates to be used to respond to this specification are outlined in Section 2.

Eligible qualifications which form part of the mainstream Train to Gain offer can be found within the [LSC Funding Guidance 2008/09 – Funding Principles, Rules and Regulations](#) and also on the LSC’s Learning Aims Database at <http://providers.lsc.gov.uk/LAD/aims/searchcriteria.asp>.

Skills for Life and ESOL at Entry Level 1, Entry Level 2, Entry Level 3, Level 1 or Level 2 will be covered under this specification as per the usual Train to Gain arrangements where an employer contribution to ESOL will be required. Tendering organisations should refer to the following document for further guidance [Train to Gain Additional Flexibilities 2008/09](#).

**NB:** The units which currently form part of the Train to Gain SME flexibilities are not covered under this ESF specification – these will continue to be supported via the core Train to Gain contracts.

## TARGET GROUPS

Employers in any occupational sector can be targeted, as long as employer demand is in evidence. We are looking for a balance of provision which will support employers across London. We would like to see a range of appropriate qualifications delivered across all sectors and across London. Organisations with more than 5,000 employees cannot be engaged by providers in these projects. These employers should be referred to the National Employer Service if they have any training requirements.

Learners must meet the LSC learner eligibility requirements set out in [LSC Funding Guidance 2008/09 - Learner Eligibility Guidance](#) paragraphs 14–18.

Learners must also meet one of the following criteria:

- be working for an employer under a contract of employment;
- be self-employed; or
- be working for an employment agency.

**NB:** Public sector workers and volunteers are ineligible for funding under this specification and tendering organisations should note that, under ESF rules, individuals must be employed for at least eight hours a week to be classified as “employed”.

In addition, tenders will need to demonstrate how they will reflect the diversity of the London population and address the London ESF Framework indicators of:

- People with disabilities/health conditions (15%)
- People aged 50+ (20%)
- People from ethnic minorities (37%)
- Women (50%)

Not all projects need to recruit the exact proportions of the groups above, for example, a single project could target people with disabilities in particular. Projects should explain the rationale for their focus and set out clearly in their proposal how they plan to achieve their target.

## **SECTION 2 – REGIONAL REQUIREMENTS**

### **REGIONAL PRIORITIES**

London is continuing to invest heavily in Train to Gain and is keen to build on the already successful delivery of the service within the region. To support employer demand we are procuring additional provision through ESF.

Tenders are invited for provision that covers all or part of the London region. Providers must demonstrate that there is employer demand for the activities they are proposing to deliver and must demonstrate awareness of existing activities within the sector and/or geographical area they are targeting. Providers should also demonstrate links with:

- Sector Skills Councils;
- Employer groups; and
- National Skills Academies (where appropriate).

Providers do not need to have an existing Train to Gain contract in order to tender under this specification.

### **OUTPUTS**

In responding to this specification, tendering organisations should identify the following outputs and results:

- Numbers of individual participants starting and receiving assessment
- Numbers of starts and achievements on NVQ Level 2 qualifications
- Numbers of starts and achievements on NVQ Level 3 qualifications
- Numbers of starts and achievements on NVQ Level 4 qualifications
- Numbers of starts and achievements on Skills for Life qualifications

Exact numbers of qualifications will be determined by tendering organisations in response to identified employer demand. Providers must identify at least 350 qualification starts.

In order to comply with the LSC's minimum levels of performance (MLP) providers must ensure at least a 65% success rate.

Individual participants will be able to do both a Skills for Life qualification and an additional qualification, if required.

## OTHER OUTCOMES

Not applicable.

## FUNDING AVAILABLE

Up to £31 million is available and projects should target a minimum of 350 qualification starts.

In responding to this specification, tendering organisations should refer to the funding rates in the table below and will need to indicate how they have used this funding methodology in costing each qualification based on the sector subject area and level of qualification(s) proposed to be delivered as well as whether employer contributions will apply (please refer to the [LSC Funding Guidance 2008/09 Funding Rates](#) document for further information on employer contributions as well as background information on how Train to Gain rates are calculated). However, tendering organisations should note that the rates below are based on 2008/09 funding rates and contracts will be awarded using the 2009/10 funding rates (the final version of which will not be published until the summer). Therefore, the funding offered to successful organisations may slightly differ from that requested to account for any changes in guidance and rates.

### **Funding Rates for Greater London ESF Train to Gain Specification**

Sector Group	Sector Subject Area	Level 2 or Below Funding Rate	Level 3 or Above Funding Rate	Level 3 or Above Funding Rate (with Contribution)
A	Business, Administration and Law	£1,226	£1,841	£967
	Hospitality			
	Information and Communication Technology (ICT User)			
	Leisure, Travel and Tourism			
	Retail and Commercial Enterprise			
B	Agriculture, Horticulture and Animal Care	£1,533	£2,301	£1,208
	Hair and Beauty			
	Health, Public Services and Care			
	Information and Communication Technology (ICT Practitioner)			
C	Construction, Planning and the Built Environment	£1,839	£2,761	£1,450

	Engineering and Manufacturing Technologies			
	Transportation			
D	Basic Skills - Literacy/Numeracy	£772		
	Basic Skills – ESOL *	£405		

\* The funding rate for ESOL accounts for the expected employer contribution.

Tendering organisations should also note that, as this specification is funded from ESF, the exact funding and payment arrangements will differ from those for existing Train to Gain provision. It is envisaged that of 50% of the funding rate for a qualification will be paid on initial assessment and starting a qualification and the remaining 50% will be paid on achievement. Successful organisations will be notified of final payment arrangements.

## CONTRACT START AND END DATE

24 August 2009 – 31 December 2010. All participant achievements must be claimed by 31 December 2010.

## PROCUREMENT TIMETABLE

It is intended that the following timetable shall apply:

ITT Open	20 May 2009
Closing date for tenders	26 June 2009
Clarifications with potential providers	20 July 2009 - 31 July 2009
Notification of results	04 August 2009
Contracts to commence	24 August 2009

Organisations should satisfy themselves that they can meet the relevant deadlines. However, the LSC reserves the right to vary the timetable should circumstances dictate.

## ITT ASSESSMENT

The criteria in respect of which responses to this will be evaluated are set out below:

Criteria/Question no.		Maximum score available
1	Target Group understanding	10
2	Engaging the Target Groups	15
3	Local/Regional/National objectives	10
4	Managing and delivering proposed services	15
5	Supporting the delivery	10
6	Sub-contracting/partnering	10
7	Track record of similar delivery	20

9	Sustainable Development cross-cutting theme	3
10	Health cross-cutting theme	3

Contracts are intended to be issued to the highest scoring tenders, taking into account business sectors offered by the final package of proposed projects to ensure coverage of all sectors across London, as far as is possible. A minimum overall score will be required to be considered for contract.

### **Financial Health Assessment**

In common with other organisations, the LSC assesses individual providers' financial health to help determine the extent to which funding may be awarded. Such assessments are made as part of the LSC's wider assessment process when awarding tenders. In this way the LSC seeks to manage risk and also to provide an assessment of a supplier's ability to service and grow provision of a suitable standard. The aim is to safeguard public funds together with the interests of the LSC, the provider and learners. Financial health is one of a range of criteria the LSC assesses in deciding whether to award a contract and to what level.

A financial health assessment will be made for each organisation based on the information previously provided by providers at the QPF (Qualified Providers Framework) stage. This assessment identifies a maximum recommended limit for the value of funding agreements with each organisation. The funding limit does not mean that funding of this value will be awarded as a result of the ITT process. As part of the process, the LSC will interpret the funding limit in the light of factors designed to mitigate financial risk. This may include an assessment of the provider based on their turnover as a proportion of the contract value, to ensure the risk of failure is reduced. Further evidence of a provider's financial viability may be sought, in the event that the information they provided for QPF is out of date.

### **Consortia and Sub-Contracting**

Successful applicants who are working with sub-contractors or in partnerships will be required to provide the LSC with a copy of any sub-contract they have entered into at the clarification stage of the process.

It should be noted that only one level of sub-contracting is permissible. Organisations must ensure that complete details of their proposals are included in their tender response. The LSC will only work with consortia on the basis of joint and several liability with each of the partners.

### **Evaluation Panels**

Evaluation teams will evaluate and assess the ITT's against the criteria stated in these documents. Each bid will be scored by two LSC staff independently and also moderated by an LSC specialist in this area.

### **Tender Clarifications**

During tender evaluation of the ITT, the LSC may wish to discuss particular aspects of an organisation's tender to clarify aspects of it or improve the LSC's understanding of the offer. Interviews of organisations will be required at this stage, which will take place at the end of July, as indicated in the timetable.

## **Feedback to Unsuccessful Organisations**

Following the completion of the ITT evaluation stage, written feedback will be provided to unsuccessful organisations and a standstill period as defined in the European Union Procurement Directives will allow for challenges to the results.

## **Freedom of Information**

The LSC is subject to the Freedom of Information Act 2000 (FOIA). Under the provision of the FOIA, the LSC is required to provide information it holds in response to a request made in accordance with the FOIA. This includes information about third parties. Organisations are referred to the Guidance to Tenderers and Learning and Skills Council's Policy for Access to Information.

## **TUPE**

Organisations are advised that the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) may apply where the contract awarded is for the provision of services currently being carried out by an existing organisation.

Organisations must take their own legal advice on the application of TUPE.

Organisations need to be aware of the specific requirements which apply to the transfer of public sector employees, and should refer to the Cabinet Office Statement of Practice on Staff Transfers in the Public Sector of January 2000 ODPM Circular 03/2003, HM Treasury Guidance "A Fair Deal for Pensions" of June 1999 and "Fair Deal for Staff Pensions: Procurement of Bulk Transfer Agreements and Related Issues" of June 2004 and the Code of Practice on Workforce Matters in the Public Service.

One of the requirements in relation to public sector employees is the requirement to provide a broadly comparable pension. Tendering organisations will be required to submit details of their current pension arrangements relating to staff if the proposed transfer relates to staff transferring from the Public Sector. We will endeavour to inform organisations if this is the case at an early stage in the process

## **Contracting Terms**

Contracts to be issued will be the standard LSC Education and Training contracts, with ESF schedules attached.

The LSC reserves the right not to award contracts in any or all categories as a result of this procurement.

The LSC reserves the right not to allocate all of the funding indicated in this specification.

This contract will be between the selected provider(s) and the LSC, or any successor organisation to the LSC following changes under Machinery of Government (MOG) Review, happening in 2009/10.

## SECTION 3 – SPECIFICATION QUESTIONNAIRE

**TENDER TITLE:**

**Greater London ESF Train to Gain**

**TENDER REF:**

**GL.ESF.TtG**

**ORGANISATION NAME:**

Please enter the name of your organisation here

### ACTIVITY OVERVIEW

Please provide a summary of the activities you intend to deliver. This information will be used as part of the decision making process to provide an overview of the applicant's response to the tender.

Please enter your answer here

**1 HOW WOULD YOU DEFINE THE TARGET GROUP(S) IDENTIFIED IN THIS SPECIFICATION AND WHAT IS YOUR EXPERIENCE OF WORKING WITH THIS GROUP(S)?**

**Tips**

Your response should demonstrate:

- an understanding and explanation of the target group(s) and their specific needs
- make reference to any specific characteristics that the target group(s) may have
- specify in what way your proposed activities have been designed to meet these needs
- quote any documents that identify the needs
- outline the experience that your organisation has of working with the target group(s)
- explain how you will identify the employers to be supported by your proposed activities

Ref: GL.ESF.TtG.C01

Please enter your answer here

**2 HOW WILL YOU ENGAGE WITH AND MEET THE NEEDS OF ELIGIBLE TARGET GROUP(S)?**

**Tips**

Your response should describe:

- the proposed activity to be delivered
- how the proposed activity will engage with and meet the needs of the target group(s)
- how you will ensure that your delivery will be flexible in meeting the needs of the target group(s)
- how you will ensure that participants (employers and/or individuals) are eligible for support
- how you will identify and work with other deliverers/intermediary bodies, where appropriate

For employers as the target group:

	<ul style="list-style-type: none"> <li>• how you will engage with employers, setting out the links you have with employers and/or how these will be developed</li> <li>• how you will promote your offer to employers</li> <li>• how you will identify employers' skill needs</li> <li>• your referral process</li> </ul> <p>For individuals as the target group:</p> <ul style="list-style-type: none"> <li>• how you will engage with, recruit and retain individuals and demonstrate that this process is appropriate</li> <li>• how individual needs will be identified and addressed in an imaginative and innovative way</li> <li>• your approach to initial assessment and information, advice and guidance (IAG)</li> <li>• how you will ensure participants progress into further development where relevant</li> </ul> <p>Ref: GL.ESF.TtG.C02</p>
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**Please enter your answer here**

<b>3</b>	<p><b>HOW DO YOUR PROPOSED ACTIVITIES CONTRIBUTE TO LOCAL/REGIONAL/NATIONAL OBJECTIVES AND ADD VALUE TO OTHER ACTIVITIES THAT ARE AVAILABLE TO THE TARGET GROUP(S)?</b></p> <p><b>Tips</b> Your response should identify and/or describe:</p> <ul style="list-style-type: none"> <li>• known skill shortages</li> <li>• the needs of the local/regional/national employer bases</li> <li>• priority sectors and/or growth sectors</li> <li>• relevant strategies, plans, frameworks, policy initiatives and other programmes</li> <li>• the employer demand for the activities they are proposing to deliver and awareness of existing activities within the sector and/or geographical area targeted</li> </ul> <p>Ref: GL.ESF.TtG.C03</p>
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**Please enter your answer here**

<b>4</b>	<p><b>HOW WILL YOU MANAGE AND DELIVER THE PROPOSED ACTIVITIES?</b></p> <p><b>Tips</b> Your response should describe:</p> <ul style="list-style-type: none"> <li>• your model of delivery including your management arrangements</li> <li>• how the different activities within your proposal will be developed, implemented, measured and evaluated</li> <li>• how these activities will deliver the aim, objectives and milestones identified in the specification</li> <li>• how your activity will remain sufficiently flexible over the term of your contract to respond to emerging economic development and policy initiatives and changes</li> <li>• what your quality assurance arrangements are, how you will ensure continuous improvement and how you will seek and evaluate learner feedback, including details of quality systems used by your organisation such as Common Inspection Framework or Matrix standards</li> <li>• an explanation of how your organisation assures the quality of its provision if it is not currently inspected</li> <li>• confirmation that your organisation is an accredited centre to deliver the qualifications/activity being proposed</li> <li>• your management information systems and resources and how they will be applied</li> </ul>
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to the gathering and recording of the information required for the Individual Learner Record (ILR) and performance management

- how the aims, objectives and milestones identified in the specification are reflected in the outputs and results (including the qualifications to be delivered by sector and level and the pricing for them) specified in your Financial Spreadsheet Part B.

Ref: GL.ESF.TtG.C04

**Please enter your answer here**

**5 WHAT STRUCTURES WILL YOU USE TO SUPPORT YOUR PROPOSED DELIVERY MODEL?**

**Tips**

Your response should describe:

- how the proposed model is appropriate for the target groups, sectors and geographic locations
- the infrastructure for the delivery of the proposed activity. If the lead organisation is based outside the region, please describe the arrangements for delivering the activities within the region
- additional staff, premises or other resources identified
- all marketing activity which will be carried out

Ref: GL.ESF.TtG.C05

**Please enter your answer here**

**6 WHICH PARTS OF YOUR PROPOSAL WILL BE DELIVERED IN CONJUNCTION WITH OTHER ORGANISATIONS?**

**Tips**

Your response should describe:

- the following details in relation to your active partners/sub-contractors and any potential partners/sub-contractors:
  - name of partner/sub-contractor
  - contact name, address and telephone number for the partner/sub-contractor
  - if this tender is successful, whether the partner/sub-contractor will be in receipt of ESF funds from this proposal and, if they will, the approximate amount which will be awarded to this partner/sub-contractor
  - if the organisation is an active partner in the proposed activities at the point of tender submission
  - if the organisation is a sub-contractor
  - the roles and responsibilities of the partner/sub-contractor in the proposed activity
  - if you intend that your organisation will be working without sub-contractors or partners, you should indicate this in the space provided for additional information and give evidence that you are capable of delivering on your own.

Ref: GL.ESF.TtG.C06

### Role of the lead Organisation

Please enter name here

Please provide Contact Name, Address and Telephone Number for Lead Organisation.

Please enter name here

### Partner/Sub-contractor 1

Name of Organisation: Please enter name here

Please provide Contact Name, Address and Telephone Number for Partner/Sub-contractor 1.

Please enter answer here

If this tender is successful will this partner be in receipt of ESF funds from this proposal?

Yes No

If yes, please identify the approximate amount which will be awarded to this partner: £ 0

Is this organisation an active partner in the proposed activities at the point of Tender Submission? Yes No

Is this organisation a sub-contractor? Yes No

Roles and Responsibilities: (Max character limit = 250)

Please enter answer here

### Partner/Sub-contractor 2

Name of Partner/Sub-contractor: Please enter name here

Please provide Contact Name, Address and Telephone Number for Partner/Sub-contractor 2.

Please enter answer here

If this tender is successful will this partner be in receipt of ESF funds from this proposal?

Yes No

If yes, please identify the approximate amount which will be awarded to this partner: £ 0

Is this organisation an active partner in the proposed activities at the point of Tender Submission? Yes No

Is this organisation a sub-contractor? Yes No

Roles and Responsibilities: (Max character limit = 250)

Please enter answer here

### Partner/Sub-contractor 3

Name of Partner/Sub-contractor: Please enter name here

Please provide Contact Name, Address and Telephone Number for Partner/Sub-contractor 3.

Please enter answer here

If this tender is successful will this partner be in receipt of ESF funds from this proposal?

Yes No

If yes, please identify the approximate amount which will be awarded to this partner: £ 0

Is this organisation an active partner in the proposed activities at the point of Tender Submission? Yes No

Is this organisation a sub-contractor? Yes No

Roles and Responsibilities: (Max character limit = 250)

Please enter answer here

**Partner/Sub-contractor 4**

Name of Partner/Sub-contractor: Please enter name here

Please provide Contact name, Address and Telephone Number for Partner/Sub-contractor 4.

Please enter answer here

If this tender is successful will this partner be in receipt of ESF funds from this proposal?

Yes  No

If yes, please identify the approximate amount which will be awarded to this partner: £ 0

Is this organisation an active partner in the proposed activities at the point of Tender

Submission? Yes No

Is this organisation a sub-contractor? Yes No

Roles and Responsibilities: (Max character limit = 250)

Please enter answer here

**Please put details of additional Partners/Sub-contractors below.**

Please enter answer here

**Additional Information Required**

**Tips**

- if it is not anticipated that partners will be involved, explain why this is the case and provide justification that this will not inhibit the success of the activity in any way
- if potential partner/sub-contractor relationships are not already established, please describe how you will secure their commitment and/or involved (letters of commitment are not required at this point, but will be required at a later stage of the tendering round)
- the extent to which unsecured partner involvement is required and highlight where reduced or lack of involvement might place the proposed activity at risk
- your role as prime contractor
- how the partnership will be managed

**Please enter your answer here**

**7 WHAT IS YOUR TRACK RECORD OF MANAGING AND DELIVERING SIMILAR ACTIVITY AND MANAGEMENT CAPACITY?**

**Tips**

	<p>Your response should outline the lead organisation and its staff's previous experience of managing and delivering similar activities, including:</p> <ul style="list-style-type: none"> <li>• details of projects managed indicating the size of projects managed</li> <li>• justification that the lead organisation has the capacity to deliver the proposed activity</li> <li>• details of staff and staff qualifications relevant to the activities proposed</li> <li>• identifying any relevant specialist expertise in your organisation, particularly in ESF delivery</li> <li>• where activity is being delivered by a consortium or partnership, please outline previous experience of managing partners/sub-contractors</li> <li>• specify what the projects originally intended to deliver and the results achieved, including details of success rates, outputs and results targets and volumes delivered – <b>Please Note that the LSC will verify information about previous performance under all relevant contracts with the LSC and/or other ESF co-financing organisations and this information will be considered by the Contract Award Panel</b></li> </ul> <p>Ref: GL.ESF.TtG.C07</p>
<b>Please enter your answer here</b>	
<p><b>8</b></p>	<p><b>HOW WILL YOUR ACTIVITY CONTRIBUTE TO THE EQUALITY AND DIVERSITY CROSS CUTTING THEME?</b></p> <p><b>Tips</b> Your response should:</p> <ul style="list-style-type: none"> <li>• describe the wide range of needs that exist within your target group(s) and demonstrate that you understand these different needs</li> <li>• explain any previous experience you have of working with the different target group(s) and or/how you have conducted research or consultation exercises to find out about their different needs</li> <li>• explain how you will influence employer behaviour to respond to the needs of participants</li> <li>• explain how your Equal Opportunities Policy and Plan will impact upon staff and participants involved in your proposal.</li> <li>• If you are working with other organisations, explain how you will ensure that they are committed to equal opportunities</li> </ul> <p>Ref: GL.ESF.TtG.C08</p>
<b>Please enter your answer here</b>	
<p><b>9</b></p>	<p><b>HOW WILL YOUR ACTIVITY CONTRIBUTE TO THE SUSTAINABLE DEVELOPMENT CROSS CUTTING THEME?</b></p> <p><b>Tips</b> Outline how the proposed activities will support the regional approaches to sustainable development, particularly focusing on:</p> <ul style="list-style-type: none"> <li>• protecting the environment</li> <li>• careful use of natural resources</li> <li>• progress that recognises the needs of everyone</li> <li>• maintaining high and steady levels of economic growth and employment</li> </ul> <p>Ref: GL.ESF.TtG.C09</p>

**Please enter your answer here**

**10 HOW WILL YOUR ACTIVITY CONTRIBUTE TO THE HEALTH CROSS CUTTING THEME?**

**Tips**

Outline how the proposed activities will support the London approach to health, particularly focusing on:

- how health promoting activity is delivered by the activities;
- how the activities will contribute to a reduction in health inequalities, particularly in terms of appropriate targeting of activity;
- how this approach links to the equality and diversity and sustainable development cross cutting themes.

Ref: GL.ESF.TtG.C10

**Please enter your answer here**