**Charnwood Borough Council**

**Equality Impact Assessment**

**‘Knowing the needs of your customers and employees’**

* **Background**

An Equality Impact Assessment is an improvement tool.  It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

* **Legislation- Equality Duty**

As a local authority that provides services to the public, Charnwood Borough Council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

     Eliminate discrimination, harassment and victimisation

     Advance Equality of Opportunity

     Foster good relations

For the following protected characteristics:

**1.**     Age

**2.**    Disability

**3.**     Gender reassignment

**4.**     Marriage and civil partnership

**5.**     Pregnancy and maternity

**6.**     Race

**7.**     Religion and belief

**8.**     Sex (Gender)

**9.**     Sexual orientation

What is prohibited?

**1.**     Direct Discrimination

**2.**    Indirect Discrimination

**3.**     Harassment

**4.**     Victimisation

**5.**     Discrimination by association

**6.**     Discrimination by perception

**7.**     Pregnancy and maternity discrimination

**8.**     Discrimination arising from disability

**9.**     Failing to make reasonable adjustments

**Note: Complete the action plan as you go through the questions**

* **Step 1 – Introductory information**

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| Title of the policy | Online Customer Experience Project |
| Name of lead officer and others undertaking this assessment | Donna King – Project Manager  Simon Jackson – Strategic Director of Corporate Services  Richard Bennett – Head of Planning and Regeneration  Helen Gretton – Improvement and Organisational Development Manager  Project Team Members |
| Date EIA started | 21 September 2015 |
| Date EIA completed |  |

* **Step 2 – Overview of policy/function being assessed:**

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| Outline: What is the purpose of this policy? (Specify aims and objectives) |
| The Online Customer Experience Project relates to a 2020 vision that has been developed at a strategic level which proposes to provide 80% of the council’s transactions digitally through its website. This will support a more efficient authority and increase compliance through access to services 24/7.  The Council has invested in its website and already has a range of processes available online. However, the trend towards new technology – for instance, in tablet and mobile devices – is making it easier for customers to engage with us digitally. Therefore in order to maximise customer satisfaction further work is required to transform the way our services can be delivered.  As part of the review the objectives of the online customer experience project is to:   * Offer 80% of our services online by 2020.Provide transactional services and information online in a user-friendly and inclusive way closer to that seen in the private sector. * Improve the overall online experience of visitors to our website through the mapping of customer journeys. * Increase efficiencies through the promotion of self service through electronic channels and citizen accounts. * Channel communications, such as letters and emails, to structured communications. * Consider the growth of Social Media on how customers engage with us. * Support our internal businesses to compete in a digital economy. * Deliver a mobile first website to ensure that council services can be delivered on a variety of devices.   Key aspects of the project for consideration are:   * Are there barriers for customers using the online services the council will offer? * Will the project disadvantage groups or individuals by not having access to the internet or the digital skills to use the online services? * Take account of vulnerable groups who may have learning difficulties or disadvantage protected groups with visual and physical disabilities from accessing the council’s services. |
| What specific group/s is the policy designed to affect/impact and what is the intended change or outcome for them? |
| The project will impact on all residents, customers and council employees as the number of online self-serve services increases, providing additional channels of access available.  In the foreseeable future, no changes will be applied to the current access channels. Therefore, face to face, telephone and paper communication will continue to be open channels and run alongside the online channel.  The intended change is for the project to provide an additional channel for residents, customers and staff to operate and engage with the Council. |
| Which groups have been consulted as part of the creation or review of the policy? |
| Councils are being urged to think about what they can do now to improve the quality of the online experience ahead of a new government offering of ‘agenda for digital change’. Many national trends and research such as the Socitm research and improvement/ general public consultation has been used to support these as identified in Step 3.  At this stage of the project, no direct consultation, specifically aimed at the protected characteristics groups, has been conducted. However the Councils Equality Working Group (EWG) has been consulted on the Online Customer Experience project and advice has been sought on this EIA.  Further consultation will be required throughout the creation of the e-forms, to specifically ensure that all barriers to access are removed. The way in which this consultation will be carried out, is yet to be confirmed but may potentially include a focus group of staff and customers, representing the various protected characteristics.  Internal consultation includes:  Senior Management Team  Staff - Consulted via One Charnwood. **-See action plan**  Residents - via the Citizens panel survey asking for opinions. **-See action plan**  Discussions with heads of service/serve managers. **-See action plan**  Customer Service teams **-See action plan**  The project will continue to reference these sources for informed decisions as identified in Step 7. |

* **Step 3 – What we already know and where there are gaps**

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| List any existing information/data do you have/monitor about different diverse groups in relation to this policy? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.  Data/information such as:   * Consultation * Previous Equality Impact Assessments * Demographic information * Anecdotal and other evidence |
| The following sources have been used to collate information for the project approach. To identify current customer journeys establish customer satisfaction rates identify where online improvements could be made.   * Consultations with services/customers Service Teams/ face to face and back office. * Customer Service Excellence Survey * Govemetrics Customer satisfaction survey * Citizen’s panel survey * Charnwood Borough Council Service Surveys * Channel Shift events * [Charnwood Borough Council Demographic Profiling Information](http://www.charnwood.gov.uk/files/documents/charnwood_demographic_information_2013/Charnwood%20Borough%20Council%20Demographic%20Profile%202013.pdf) * [Data Protection Act](http://info.charnwood.local/default.aspx) * [SOCitm Research and Improvement](http://www.charnwood.gov.uk/files/documents/charnwood_demographic_information_2013/Charnwood%20Borough%20Council%20Demographic%20Profile%202013.pdf) * [Age UK](https://www.google.co.uk/?gws_rd=ssl#safe=strict&q=Digital+by+default+%E2%80%93+Citizen+Advice+response+to+HMRC+2014.) |
| What does this information / data tell you about diverse group? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (Please list) |
| Charnwood Borough Councils current channels to access services are not being removed so for the different diverse groups who are unable to use the new methods they can continue using existing channels. The impact could possibly mean that in comparison to those who are not disadvantaged by the change a less timely turnover period for resolution/transaction.  The specific groups potentially affected will include older people, people with disabilities, younger people, race, and other socially excluded groups. For these groups there may be a negative impact that could put them at a disadvantage for a number of factors ranging from lack of digital knowledge and skill, literacy levels, being unable to afford digital devices and/or access the internet from their residents, barriers to accessing technology etc.  Monitoring of the protected characteristic will be essential to ensure barriers continue to be removed and negative impacts are not experienced by customers. Monitoring will take place throughout development of the project and via feedback, complaint suggestions following implementation of the system. |

* **Step 4 – Do we need to seek the views of others? If so, who?**

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| In light of the answers you have given in Step 2, do you need to consult with specific groups to identify needs / issues? If not please explain why. |
| The Online Customer Experience project team will ensure the approach reflects the current local and national trends and needs. Consultation with the Council’s Equality Working Group will continue to support the protected characteristics interest needs and issues on going as part of the project delivery.  Further consultation will be required throughout the creation of the e-forms, to specifically ensure that all barriers to access are removed. The way in which this consultation will be carried out, is yet to be confirmed but may potentially include a focus group of staff and customers, representing the various protected characteristics.  The project will continue to reference these sources for informed decisions as identified in Step 7. |

* **Step 5 – Assessing the impact**

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| In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the individuals or community groups (including what barriers these individuals or groups may face) who identify with any ‘protected characteristics’ and provide an explanation for your decision (please refer to the general duties on the front page). | |
|  | **Comments** |
| **Age** | The online Customer Experience Project may have a potential negative impact on older people, thus putting this group of people at a disadvantage as they may not use internet services as frequently or confidently as a younger demographic who have grown up with the technology.  In order to mitigate any adverse impact in the foreseeable future, no changes will be applied to the current access channels. Therefore, face to face, telephone and paper communication will continue to be open channels and run alongside the online channel.  For younger people the online customer experience project will have a positive impact as digital services form part of everyday life for this community group and so this will be an additional access channel for them to utilise.  For those who do not have access to or cannot afford the digital devices and/or internet access will be encouraged to access the council’s services using the public access PCs in the councils Customer Services Area. |
| **Disability**  **(Physical, visual, hearing, learning disabilities, mental health)** | The Project will create positive impacts for individuals with physical disabilities as creating the additional online access channel will reduce the need to travel etc. into the council building.  The project may also create positive impacts for the deaf community/ people with hearing impairments. It will provide an alternative access channel and may reduce any potential barriers experienced with face-to- face/ telephone contact.  With regards to mental health, the impact is unknown. It has the potential to create positive impacts for people with mental health issues as it removes barriers for those individuals who may find it difficult to communicate face to face or over the telephone.  However, individuals with mental health issues may also potentially be negatively impacted as they may face barriers without the ‘human’ support offered via telephone or face to face channels. Additionally, the isolation of online access for individuals with mental health issues may be a missed opportunity for the Council to support individuals via signposting to support etc.  The Project may have a potential negative impact on individuals with visual impartments, thus putting this group of people at a disadvantage. In order to mitigate any adverse impact, testing will be required to ensure all web access, online forms and online transaction procedures are compatible with screen reader technology etc.  Additionally, the Project may have a potential negative impact on people with learning disabilities if any potential barriers are not removed.  Effective communication is key to ensuring individuals do not face barriers to access. Mitigating actions to remove any barriers include the use of Plain English (and consideration of Easy Read) on all web pages, online forms and online transaction procedures and all procedures to be streamlined and straightforward to use for all.  In order to mitigate any adverse impact in the foreseeable future for this protected characteristic, no changes will be applied to the current access channels. Therefore, face to face, telephone and paper communication will continue to be open channels and run alongside the online channel. Monitoring of this protected characteristic will be essential to ensure barriers continue to be removed and negative impacts are not experienced by customers. |
| **Gender Reassignment**  **(Transgender)** | Neutral impact by the council providing additional online services through its website. The positive impacts of the Online Customer Experience apply to everyone irrespective of Gender Reassignment. |
| **Race** | With regards to race, the impact is unknown. Some individuals may potentially experience negative impacts due to language barriers if English is not their first language, which can be overcome via other access channels.  Positive impact may also be experienced as online access can be enhanced by the use of technology to translate into alternative languages, as appropriate. This will mitigate any interpretation or translation requirements which may be required via other channels.  Effective communication is key to ensuring individuals do not face barriers to access. Mitigating actions to remove any barriers, including the use of Plain English on all web pages, online forms and online transaction procedures and all procedures to be streamlined and straightforward to use for all.  The consideration of supporting technology to translate into different languages will support the removal of potential barrier, to mitigate adverse impact.  Additionally, in order to mitigate any adverse impact in the foreseeable future, no changes will be applied to the current access channels. Therefore, face to face, telephone and paper communication will continue to be open channels and run alongside the online channel. |
| **Religion or Belief**  **(Includes no belief)** | Neutral impact by the council providing additional online services through its website. The positive impacts of the Online Customer Experience apply to everyone irrespective of religion or belief. |
| **Sex**  **(Gender)** | Neutral impact by the council providing additional online services through its website. The positive impacts of the Online Customer Experience apply to everyone irrespective of Sex. |
| **Sexual Orientation** | Neutral impact by the council providing additional online services through its website. The positive impacts of the Online Customer Experience apply to everyone irrespective of Sexual Orientation. |
| **Other protected groups (Pregnancy & maternity, marriage & civil partnership)** | Generally a neutral impact by the council providing additional online services through its website. The positive impacts of the Online Customer Experience apply to everyone irrespective of Other protected groups.  The Project however has the potential to create positive impacts for individuals who are pregnant as creating the additional online access channel will reduce the need to travel etc. into the council building. |
| **Other socially excluded groups**  **(carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, asylum seeker and refugee communities etc.)** | There will be a positive impact for people who are restricted from accessing face to face services or telephone services due to caring responsibilities as people will be able to use online services from home at a time that is convenient to them.  There may be negative impacts that will disadvantage these groups, as they may not have access or easy access to the internet, be able to afford devices and/or internet access.  Additionally the project has the potential to create barriers for rural isolation and those individuals with low literacy skills.  Effective communication is key to ensuring individuals do not face barriers to access. Mitigating actions to remove any barriers, including the use of Plain English on all web pages, online forms and online transaction procedures and all procedures to be streamlined and straightforward to use for all.  To mitigate further adverse impact in the foreseeable future, no changes will be applied to the current access channels so face to face; telephone and paper communication will continue to be open channels. |

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| Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.  Please note:   1. If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. 2. Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. |
| Where there are potential barriers/ impacts unknown identified for the protected characteristics of Age, Disability, Race, and other socially excluded groups, mitigating measures are in place identified under Step 5 assessing the impact.   * In order to mitigate any adverse impact in the foreseeable future upon all protected groups, the traditional means of contact such as telephone and face to face will continue to be available for those that require them. Users that elect to utilise the new online self-serve services will effectively free up access to the traditional channels further improving accessibility. * For those who do not have access to or cannot afford the digital devices and/or internet access will be encouraged to access the council’s services using the public access PCs in the councils Customer Services Area. * In order to mitigate any adverse impact upon individuals with visual impairments, testing will be required to ensure all web access, online forms and online transaction procedures are compatible with screen reader technology etc. * Effective communication is key to ensuring individuals do not face barriers to access. Mitigating actions to remove any barriers include the use of Plain English (and consideration of Easy Read) on all web pages, online forms and online transaction procedures and all procedures to be streamlined and straightforward to use for all. * The consideration of supporting technology to translate into different languages will support the removal of potential barrier, to mitigate adverse impact. * Monitoring of this protected characteristic will be essential to ensure barriers continue to be removed and negative impacts are not experienced by customers. |
| Summarise your findings and give an overview as to whether the policy will meet Charnwood Borough Council’s responsibilities in relation to equality and diversity (please refer to the general duties on the front page). |
| In summery the impact set out in Step 5 is mostly positive/ neutral and so meets Charnwood Borough Councils responsibilities in relation to equality and diversity. |

* **Step 6- Monitoring, evaluation and review**

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| Are there processes in place to review the findings of this Assessment and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact? |
| Consultation and focus will continue with the Internal groups mentioned in Step 2 along with the information sources referenced for informed decisions as identified in Step 7. Investigations and evaluation carried out by the project work streams will ensure that the project continues to eliminate any potential barriers which individuals or community groups may face.  Monitoring of the protected characteristic will be essential to ensure barriers continue to be removed and negative impacts are not experienced by customers. Monitoring will take place throughout development of the project and via feedback, complaint suggestions following implementation of the system. |
| How will the recommendations of this assessment be built into wider planning and review processes?  E.g. policy reviews annual plans and use of performance management systems. |
| Any identified recommendations will be available to use when planning future digital enhancements to the Councils services and learned lessons under any online customer service project. |

* **Step 7- Action Plan**

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| **Please include any identified concerns/actions/issues in this action plan:**  **The issues identified should inform your Service Plan and, if appropriate, your Consultation Plan** | | | |
| **Reference**  **Number** | **Action** | **Responsible Officer** | **Target Date** |
| 001 | Ensure any potential barriers outlined in Step 5, which may require adjustments to mitigate negative impact, are well embedded within the project planning stage. | Project Manager |  |
| 002 | Continue to monitor the project to mitigate any unforeseen equalities considerations so that the project can positively impact upon all. | Project Manager |  |
| 003 | Upon completion, continue to monitor individual feedback or satisfaction levels to ensure that none of the protected characteristics are adversely impacted. | Customer Service Manager |  |
| 004 | During the usability testing ensure that any negative impacts are addressed before they are lunched to address any equality issues where possible. To include consultation with users of specific protected characteristics. | Project Manager |  |
| 005 | The Online Customer Services communications plan will have key messages to all stakeholders which will include people with protected characteristics. | Communications Officer |  |

* **Step 8- Who needs to know about the outcomes of this assessment and how will they be informed?**

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|  | **Who needs to know**  (Please tick) | **How they will be informed**  (we have a legal duty to publish EIA’s) |
| **Employees** |  | Intranet - One Charnwood Publication |
| **Service users** |  | External communications |
| **Partners and stakeholders** |  | Project Board Meetings  Programme Board Meetings  Internal and external communications |
| **Others** |  |  |
| **To ensure ease of access, what other communication needs/concerns are there?** |  |  |

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| **Please delete as appropriate** |
| **I agree with this assessment / action plan** |
| **If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales** |
| **Signed (Service Head):**   1. ***Ward* (Head of Strategic Support)** |
| **Date: 12/01/16** |
| **Please send completed & signed assessment to Suzanne Kinder for publishing.** |