

# **Equality Impact Assessment Complaints and Appeals, Procurement**

**Name of EIA: Complaints and Appeals service requirements for ITT DSHS**

## **Aims and objectives of policy/project/practice you are assessing**

(To include: what are your division's specific responsibilities in relation to the policy? Why is it needed? What do you hope to achieve through it?)

In September 2005, the Government announced that Digital Switchover will take place between 2008 and 2012. Digital Switchover is the process of changing the television broadcasting network to digital. It will involve converting the current analogue television network, as well as encouraging the public to convert or upgrade their TV and recording equipment so they can receive digital television. This will be done TV region by TV region.

To help ensure that everyone can switch more easily to digital TV, the Government has announced that the BBC will manage a Help Scheme for people who need it most. In order to deliver against this responsibility the BBC has set up a subsidiary, Digital Switchover Help Scheme Ltd., to deliver this function. The BBC has opted to have a managed service so will choose a suitable service provider to deliver the digital switchover help scheme. The mins scheme procurement team will be responsible for selecting a suitable provider.

The Help Scheme is focused on providing practical assistance and support for people who:

- are aged 75 or over
- get or could get attendance allowance, constant attendance allowance, mobility supplement or disability living allowance
- are registered blind or partially sighted

Over seven million households in the UK will be eligible to receive help. Eligible people will be able to:

- choose a set-top digital box and receive help to install and use it
- choose a digital TV recorder or a digital TV with recorder (for an extra charge) or
- ask for advice on the options from different service providers

Most people will need to pay £40 for help – this includes:

- help to choose the right equipment
- provision of easy-to-use equipment suitable for people with specific needs (e.g. to receive audio description broadcasts)
- help with installing the equipment in the home
- fitting a new aerial where we can (if needed)
- a simple demonstration of how everything works and
- someone to call for help while getting used to things

It is free if eligible people also get:

- Income Support
- Income-based Jobseekers Allowance or
- Pension Credit

### **Main Scheme Procurement team**

The Procurement team has identified the diversity related requirements for delivery of appropriate complaints and Appeals service provision in order to meet the specific impairment or other relevant needs of eligible people and customers of the DSHS.

These requirements form part of the Schedule of Scheme Requirements that bidders will be expected to demonstrate how they will meet these in the development of their target operating model (TOM) in their tender offers. Bidders will be evaluated against these accessibility-related service requirements.

These requirements will ensure that the service is appropriate to the needs of eligible people and customers.

### **List the main activities of the policy/project/practice**

- Provide an appropriate and accessible internal review process including provision of a dedicated team of employees to deal with internal reviews, complaints and appeals
- Where a complaint or appeal is upheld, take all necessary steps to rectify issue or complaint

### **Relevant Equality Objective(s) (please see Scheme Action Plans for list)**

#### **DES**

- Obj 1, i – To assist the ‘most vulnerable beneficiaries’ (older and disabled people) to make the switchover to digital TV. The BBC to continue to work with DCMS, BERR and Digital UK on the Digital Switchover Help Scheme.
- Obj 1 ii – The BBC, through its subsidiary DSHS Ltd, to identify an appropriate provider(s) to deliver the Digital Switchover Help Scheme. The BBC to reflect disability equality in the Invitation to Tender and the scheme’s Schedule of Service Requirements to ensure the successful organisation is fully accessible to all scheme users. Prospective bidders to be assessed against accessibility-related service requirements
- Obj 1 ix – The BBC to advise on minimum standards for ensuring accessibility and inclusiveness for most vulnerable groups.
- Obj 3, iii – The BBC will work with Digital UK to assure basic minimum standards of accessible communications which are appropriate to different media platforms, as some standard routes may present barriers to some groups for example subtitling and audio description.
- Obj 3, iv – The BBC will work with Digital UK to provide, wherever practicable, specific forms of communication which are relevant and appropriate for relevant audiences, for example those with sensory impairments or learning difficulties.

## **RES**

- Obj 3 – To ensure that all digital switchover and Help Scheme related information and modes of communication are appropriate, flexible and accessible for target audience
- Obj 3, 3 – BBC will work with Digital UK to assure basic minimum standards of accessible communications, including translations and interpretation options, which are appropriate to different media platforms, as some standard routes may present barriers to some groups
- Obj 3, 4 – BBC will work with Digital UK to provide, wherever practicable, specific forms of communication which are relevant and appropriate for relevant audiences (see also 4.3.2)

## **GES**

- Action plan 3, Obj 3, iii – BBC will work with Digital UK to assure basic minimum standards of accessible communications which are appropriate to different media platforms, as some standard routes may present barriers to some groups.
- Obj 3, iv – BBC will work with Digital UK to provide, wherever practicable, specific forms of communication which are relevant and appropriate for relevant audiences (see also 3.3.5).

### **Please list those stakeholders you think will be directly affected by the policy/project/practice**

Eligible people, customers, carers, authorised nominee, Power of Attorneys, 3rd sector organisations

### **Are you targeting a particular audience? If so, which group?**

The target audience for provision of DSHS services is aimed at:

- persons aged 75 and over
- persons with cognitive or learning difficulty impairments
- persons who are blind or who have visual impairments
- persons who are deaf or who have hearing impairments
- persons with dexterity and mobility impairments
- persons with other specific impairment and other relevant needs

### **1) Use the table overleaf to detail:**

- a) Where you think that the policy/project/practice could have a negative impact on any of the equality target groups and specify which groups in particular i.e could it disadvantage them.
- b) Where you think that the policy/ project/ practice could have a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups.
- c) Where the impact is unclear or unknown.

**GUIDANCE:** A negative or adverse impact is where there is a likely differential impact such as disadvantage/discrimination/ignored or unmet needs.

In some cases the negative impacts may be justified. For example a meeting is held in a hall which, although it is further to come for one BME community (who mainly live in one part of a town), is the only hall which is fully accessible and available with a crèche – therefore enabling disabled people and those with children to attend and participate.

**GUIDANCE:** An impact that will have a positive impact on an equality target group, or some equality target groups, or improve equal opportunities and/or relationships between groups. For example, a targeted training programme for black and minority ethnic women would have a positive differential impact on black and minority ethnic women. It would not, however, necessarily have an adverse impact on white women or men.

### **Disabled people**

Impact is unclear or unknown:

- BME disabled people

Positive impact – it could benefit (please detail which groups):

- persons aged 75 and over
- persons with cognitive or learning difficulty impairments
- persons who are blind or who have visual impairments
- persons who are deaf or who have hearing impairments
- persons with dexterity and mobility impairments
- persons with other specific impairment and other relevant needs
- persons who fall into more than one of the above

Negative impact – it could disadvantage (please detail which groups):

- BME disabled people

Reason/Evidence:

Positive:

The diversity related requirements for Complaints and Appeals operations are as follows:

- Establish a detailed, accessible and appropriate internal review process in line with the provisions set out at clause 20 of the Scheme Agreement, including a dedicated team of employees to deal with internal reviews, complaints and appeals.
- Any communications relating to complaints to customers will be in the format required as already indicated on the customer record.

### **People from different ethnic or cultural backgrounds**

Impact is unclear or unknown: N/A

Positive impact – it could benefit (please detail which groups):

- 10 most used languages will be identified for each ITV region that will help identify that highest volume of BME backgrounds in each region. This will be determined using information gathered in partnership with the successful bidder, DWP, Digital UK and DSHS.

Negative impact – it could disadvantage (please detail which groups):

- Those BME groups that fall outside of the 10 determined languages for each region.

Reason/Evidence:

Positive:

- Complaints and appeals processes will meet the specific needs of all customers.

### **Men/Women/Trans people**

Impact is unclear or unknown: N/A

Positive impact – it could benefit (please detail which groups):

- Females who may not be confident to allow male field staff to attend/enter their home.
- Females from BME backgrounds may not want male field staff to enter their home

Negative impact – it could disadvantage (please detail which groups): N/A

Reason/Evidence: N/A

### **Other groups, including people of different ages; sexual orientation; faiths**

Impact is unclear or unknown: N/A

Positive impact – it could benefit (please detail which groups): N/A

Negative impact – it could disadvantage (please detail which groups): N/A

Reason/Evidence:

**2) If you have indicated that there is a positive impact on any group, you may proceed with the policy/project/practice BUT please indicate below how you will document or share this information.**

The Schedule 2 document of the draft ITT was finalised on 17 November 2007. During the development of the schedule it was effectively a living document. Subject matter experts including 2 diversity experts, procurement managers and commercial lawyers had an important part in developing and improving the requirements. The schedule was available on a shared drive for all colleagues in DSHS to access.

The requirements also took into account the findings from the focus group research (representative of the target group) which formed the development of the Codes of Services Standards.

**3) If you have indicated that the impact is unclear or unknown and you are satisfied that there is no additional evidence available, you can proceed with the policy/project/practice. However, please monitor its implementation and review/reassess in 3–6 months using the post-project review box at the end of this form.**

**4) If you have indicated there is a negative impact on any group, is that impact:**

- a) Legal (i.e it is not discriminatory under anti-discriminatory legislation)
- b) Justified
- c) Level of impact (see guidance box below)

If the negative impact is (possibly) discriminatory and cannot be justified and/or it is of high impact you **must complete section two of this form** ie. **conduct a full assessment**. If not, but there is still a potential negative impact of low significance, please complete the rest of the initial EIA below and consider carefully if completing section two would still be helpful in making a more thorough assessment.

**GUIDANCE:** In measuring impact, the Equality Commission guidance advises that due consideration should be given to proportionality and relevance.

A preliminary consideration of levels of impact should focus on:

- the degree of relevance to all 3 aspects of the duty
- what is proportionate in terms of the response required – this is usually about numbers (i.e. are you talking about detriment to just 3 people or 30,000?)
- the degree of likely impact (for example, serious disadvantage – complete loss of a TV signal for a long period OR moderate inconvenience – having to walk for 5 more minutes to a new Paypoint to pay for a licence)

The judgement then comes in considering all these together and deciding what is high or low.

**5a) Could you change or amend the policy/project/practice to minimise or remove any negative impact that is of low significance? Explain how.**

(Please use the action sheet at the end of the assessment to detail specific timetabled actions.)

There are no significant issues in relation to this function. The complaints and appeals process will meet the needs of all people, either via written or telephone communications or via face to face hearings.

**5b) Could you improve the policy/practice/project so that it does have a positive impact? Explain how.**

(Please use the action sheet at the end of the assessment to detail specific timetabled actions.)

Ensure that all members of DSHS involved in communications with customers have the necessary tools and resources to ensure access requirements are met. This will mean having the necessary operational resources available and staff trained in race/disability/age equality as well as specific disability awareness at all levels of the process (Service provider/DSHS/BBC Trust).

## **6) Equality impact assessment action plan**

Please list below any timetabled action/s that will be taken as a result of this impact assessment and indicate who will be responsible for this.

**Issue:** Ensure there are specific resources in place within DSHS to provide appropriate access support when DSHS is dealing with escalated complaints

Action required: Ring-fence resources and set up service levels with providers of alternative formats

Lead: Paul Wignall

Resource implications: Budget for meeting access and language requirements

Date by: July 2008

Achieved:

**Issue:** Ensure that DSHS staff dealing with complaints have the appropriate understanding and awareness of equality and impairment specific issues

Action required: Ensure that DSHS staff have a suitable programme of diversity and equality training

Lead: Rob

Resource implications: Budget may be required as an agreement can be reached with the new service provider

Date by: July 2008

Achieved: