

Equality Impact Assessment DSHS Marketing and Communications service requirements, Procurement

Name of EIA: Marketing and communications 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 (MSP)

The MSP was the main team within DSHS to write the final Invitation to Tender (ITT) and subsequently evaluate bids in order to select a preferred supplier for the delivery of the digital Switchover Help Scheme.

The procurement team will identify the diversity related requirements for delivery of appropriate marketing and communications 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. These are:

List the main activities of the policy/project/practice

- Use all appropriate forms of targeted marketing to ensure the most accurate, consistent, efficient and effective marketing for the Help Scheme to generate and promote awareness of the Help Scheme in a timely manner so as to:
 - alert and inform Applicants, Eligible Persons and all other relevant and/or applicable members of the public to the availability of assistance under the Help Scheme, targeting all marketing and communications to such persons, and
 - inform such persons of actions they need to take in order to obtain assistance under the Help Scheme
- Through the use of all appropriate targeted marketing and communications methods and materials, maximise the responses from all Applicants and Eligible Persons (or from Authorised Nominees, on their behalf) to all marketing and communications and participation in the Help Scheme by such persons and, where beneficial or potentially beneficial to this aim, consider and use specialist organisations and resources within both the voluntary and community sectors to facilitate this.
- Marketing and communications materials include:
 - the Options Pack
 - Installation and User Instructions
 - the content of the Help Scheme website
 - all scripts for telephone communications with the Contact Centre
 - all communications in relation to appeals and complaints

- The Service Provider will create, develop and implement a branding strategy which manifests itself consistently throughout the provision of the Services:

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
- persons who fall into more than one of the above

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 contact centre operations are as follows:

- Confirm with all Eligible Persons, Authorised Nominee's and Customers the most accessible and preferred formats of communications at the earliest opportunity and use it throughout the customer journey until it changes
- Processes in place that if there is no information regarding preferred format then send out default large print format – contact centre
- Processes in place to transcribe incoming comms for braille, audio, BSL video content
- Ensure that all written communications relating to the options pack and appointments are available in the determined 10 languages for the region
- Ensure that all inbound and outbound communications are available in the determined 10 languages for the region
- Processes in place to transcribe all incoming comms for the 10 languages that relate to: Options pack; inbound and outbound telephone communications; installation and user instructions; all written comms relating to options pack and appointments; community targeted comms and communication leaflets; all comms relating to complaints and appeals
- Comply with provisions of the Welsh Language Act 1993 in relation to all MarComs
- Ensure that all events where members of the public will attend in particular those with specific impairments are accessible and comply with the provisions of the DDA
- All MarComs materials including the website prior to first use will be tested according to accessibility so as to prevent inaccessible, inappropriate and/or confusing content and functionality including in relation to layout, design, format, colour an/or vocabulary. Testing will be done by consultation and active engagement with a representative sample of eligible people
- Check contact centre scripts for adverse impact on diversity and equality
- Conduct Equality Impact assessments for MarComs policies, practices and criteria
- Free phone number for textphone on all MarComs written communications

- Utilise specific targeted marketing and communications methods and materials which minimises the difficulties that those Applicants and Eligible Persons who are vulnerable and 'hard to reach' may have in understanding and accessing the assistance available to them under the Help Scheme
- Through the use of all appropriate targeted marketing and communications methods and materials, maximise the responses from all Applicants and Eligible Persons (or from Authorised Nominees, on their behalf) to all marketing and communications and participation in the Help Scheme by such persons and, where beneficial or potentially beneficial to this aim, consider and use specialist organisations and resources within both the voluntary and community sectors to facilitate this
- Ensure that an introduction card to be shown to Customers or their authorised Nominees on arrival at such customer's home is translated into the 10 relevant languages for the ITV region
- The SP will take into account the diverse needs, attitudes, characteristics and behaviours of Eligible Persons including persons aged 75 years or over in all MarComs
- The SP will take into account the diverse needs, attitudes, characteristics and behaviours of Eligible Persons including persons with cognitive or learning difficulty impairments in all MarComs
- The SP will take into account the diverse needs, attitudes, characteristics and behaviours of Eligible Persons including persons who are blind or who have visual impairments in all MarComs
- The SP will take into account the diverse needs, attitudes, characteristics and behaviours of Eligible Persons including persons who are deaf or who have hearing impairments in all MarComs
- The SP will take into account the diverse needs, attitudes, characteristics and behaviours of Eligible Persons including persons with dexterity and mobility impairments in all MarComs
- The SP will take into account the diverse needs, attitudes, characteristics and behaviours of Eligible Persons including persons with other specific impairment and other relevant needs in all MarComs
- The SP will take into account the diverse needs, attitudes, characteristics and behaviours of Eligible Persons including persons with multiple impairments in all MarComs

Possible negative impact:

- There may be BME disabled people who may require a more specialised service e.g. blind people who may required information in a language other than English or BME people with a cognitive impairment. Little is known about the volumes or the impact of service delivery on this group.

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 the 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):

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

Reason/Evidence:

- There may not be enough representation in literature or website of a diverse target group
- Bidders will be asked how Marketing and Communications operations will meet the needs of BME eligible people and customers
- Bidders will be asked to build into their TOM as part of the competitive dialogue process to consider how positive relations will be promoted through marketing and communications activities e.g images in literature

Men/Women/Trans people

Impact unclear or unknown: N/A

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

- Men/Women/transgender

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

Reason/Evidence:

- The service provider will be asked to ensure that gender is represented as fairly and equally as possible in literature.

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

Impact unclear or unknown: N/A

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

- Older people and over 75 years

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

- Disabled older people in medical care settings

Reason/Evidence:

- The service provider will be asked to consider how best to represent those eligible people who are over 75 years age and disabled. It is common to find images depicting this group within medical care settings, thus promoting the medical model of disability and the negative images of older disabled people. The service provider will need to ensure that care is taken not to negatively portray this group of people.

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 the 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.)

More research and involvement of disabled BME people will help to identify specific needs in respect of information about DSHS. However, in the absence of this, consideration should also be made to any request to meet specific needs.

Negative impact can also be reduced by supporting those people with additional language needs where the language does not fall within the I0 that has been determined for each ITV region, bearing in mind this is on the basis of on request only.

Ensure that in the development of scheme literature and branding that any images represent a wide range of people who would benefit from help under the scheme, including consideration made to social classes given that many eligible people.

Ensure that the scheme does not depict older people in medical care settings as this reinforces the medical model of disability approach.

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.)

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: consideration should be made to any request to meet specific needs for disabled BME eligible people and customers.

Action required:

- Ensure that the new service provider will capture diversity monitoring data on eligible people, applicants and customers
- Monitor on a monthly basis over 6 months period for Border for any trends related the unfulfilled needs of disabled BME people and put in place operational processes to meet these needs in time for the next ITV region.
- Revisit focus group research to determine if there is information that will help provide a better service to disabled BME applicants

Lead: Rob

Resource implications: None, as the SP will need to provides appropriate metrics. Diversity role needed to ensure relevant data is being collected and analysed

Date by:

Achieved:

Issue: People with additional language needs where the language does not fall within the 10 that has been determined for each ITV region.

Action required: Have in place a process to help applicants and customers who may need language support where the languages is outside the 10 predetermined for each region

Lead: Service Provider

Resource implications: Additional language resources may be needed if volumes suggest impact is high.

Date by:

Achieved:

Issue: Scheme branding and literature does not negatively portray target group and positively promotes relations

Action required: Ensure that a range of positive imagery is used

Lead: Jackie

Resource implications: appropriate photography

Date by:

Achieved: