

# **Initial Equality Impact Assessment – TV Licensing Brand Refresh Project**

**Name of EIA: TV Licensing brand refresh project**

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

(To include: what are the BBC's specific responsibilities in respect of TV Licensing in relation to the policy? Why is it needed? What do you hope to achieve through it?)

Project to change the TV Licensing logo, and to create guidelines on use of colour, typefaces and visual imagery to be used by marketing agencies when developing new customer communications.

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

- Development of new logo
- Choosing standard typeface, standard colour palette, visual imagery style
- Creating a brand guidelines document
- Researching impact on customers

**Relevant Equality Objective(s)** (please see Appendix A for list):

To communicate wherever practicable, in a way that is accessible and appropriate, to facilitate a clear understanding of television licensing obligations for all sections of the community.

NB: In respect of gender, disability and race, the EIA assists us in carrying out our equality duties in those areas and are informed by the relevant equality schemes and action plans. There are no specific legal duties relating to age, faith and sexual orientation at present. However, it is important that our activities take account of the views of all licence fee payers. We have, therefore, included these groups within the EIA below to ensure that any particular issues are highlighted

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

All TV Licence fee payers, and those companies contracted by the BBC to administer the collection of the TV Licence and enforcement of the television licensing system.

Are you targeting a particular audience, if so which group? The brand guidelines are targeted specifically at the companies contracted by the BBC to develop customer communications. The communications that they produce are not part of this assessment – they are covered by the Marketing EIA conducted in July 2007, which will be reassessed by March 2009.

**I) 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 may be 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: No

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

Negative impact – it could disadvantage (please detail which groups): No

Reason/Evidence:

- Given that this change is confined to how communications look, group most likely to be impacted by change are those people with visual impairment.
- Advice on communicating with visually impaired audiences was sought from RNIB – this advice has been included in the brand guidelines together with details on where to find further information from the RNIB. This will result in changes being made to a number of letters – particularly with regards to use of contrasting background colours.
- The new logo is compliant with the advice from RNIB – it uses high contrast colours and a clear typeface. It also spells the words “TV Licensing” clearly (as opposed to incorporating them into a graphical device), and these words must always appear against a plain background with a high contrast between lettering and background. There were no formal rules in place for the previous logo, meaning it was possible for it to be used in a way that was less clear for visually impaired audiences than the new logo.
- The new typeface – Helvetica – has been chosen because it is recognised as one of the clearest typefaces available, for example the “Images of Disability” booklet

produced by the government which uses Helvetica as an example of a typeface that is easier to read.

- Our new guidance on use of visual imagery state that we should not use photographs of people in our communications – this is to avoid inadvertently stereotyping any particular group in our communications.

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

Impact is unclear or unknown: No

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

Negative impact – it could disadvantage (please detail which groups): No

Reason/Evidence:

- As mentioned above, our new guidance on use of visual imagery state that we should not use photographs of people in our communications – this is to avoid inadvertently stereotyping any particular group in our communications.
- Focus group research on the new designs included a selection of people from different racial and ethnic backgrounds. Additional research was done on people from Turkish, Polish, Brazilian Portuguese and South Asian backgrounds (these groups were chosen to represent a broad cross section of different needs, in order to highlight whether a broader piece of research would be required). This additional research showed that these groups preferred the new communications to the old ones, and no issues were highlighted with the new identity. No differences of opinion were expressed based on ethnic identity.

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

Impact is unclear or unknown: No

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

Negative impact – it could disadvantage (please detail which groups):No

Reason/Evidence:

- As mentioned above, our new guidance on use of visual imagery state that we should not use photographs of people in our communications – this is to avoid inadvertently stereotyping any particular group in our communications.
- Focus groups were conducted that were split by gender. However, there was no significant difference between the responses of men and women – both were positive about the new design.

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

Impact is unclear or unknown: No

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

Negative impact – it could disadvantage (please detail which groups): No

Reason/Evidence:

- Focus groups were conducted with the Over 75s to understand the impact of the changes on them – these groups were positive about the changes. There was a

specific issue with the clarity of one piece of communication tested – this was rectified prior to the leaflet being sent to customers. This group will benefit from the adoption of the guidance from the RNIB on communicating to the visually impaired.

- This impact assessment did not identify any potential impacts of this project with regards to faith or sexual orientation.

**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.**

These will be further reviewed in July 2008. It is intended that this document will ultimately become part of the overall Marketing EIA.

**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: N/A (i.e it is not discriminatory under anti-discriminatory legislation)
- b) Justified: N/A
- c) Level of impact: N/A (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** i.e. **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.)

N/A

**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.)

N/A

### **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:** Incorporate this EIA into broader Marketing processes.

Action required: Incorporate review of this EIA into next Marketing EIA.

Lead: Marketing

Resource implications:

Date by: TBC

Achieved

## **Appendix A – TV Licensing’s Equality Objectives**

### **All Schemes**

- 1) To communicate wherever practicable, in a way that is accessible and appropriate, to facilitate a clear understanding of television licensing obligations for all sections of the community.
- 2) To ensure that all BBC TVL staff and contractors fully understand their duty to promote race/disability/gender equality and are active in implementing actions identified.
- 3) To continually review and wherever possible improve or develop service supports (including technology) to provide accessible, convenient support/advice services and encourage all sections of the community to engage with TVL as necessary.
- 4) To develop and maintain a strategic and systematic approach to integrating race/disability/gender equality into all TVL activities.
- 5) To maximise the potential for data and information management systems to enhance and promote race/disability/gender equality.
- 6) To develop and maintain strategic leadership and commitment to the broad implementation of the RES/DES/GES and the TVL action plan.
- 7) To ensure that all payment methods/processes are accessible and appropriate for a range of needs/lifestyles.
- 8) To ensure a strategic approach to integrating race/disability/gender equality into all TVL procurement activities.