1. Introduction

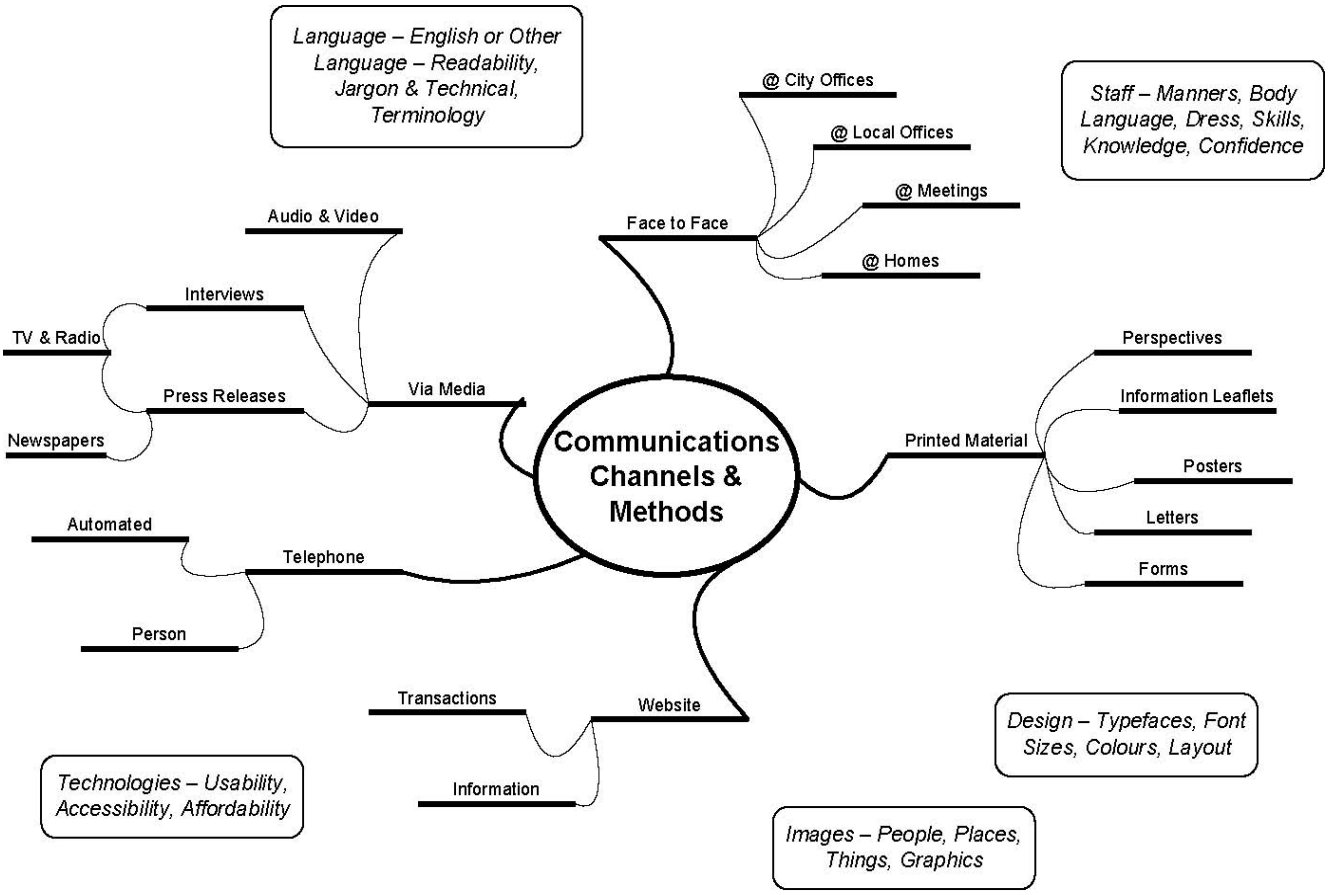
This report briefly summarises how the generic Equality Impact Assessment on Communications was undertaken, it's scope and the key findings.

The assessment was undertaken by 7 officers drawn from relevant departments and facilitated by the council's Equality & Inclusion Consultant. In addition to two 2 hour training sessions, the assessment required five 2 hour meetings spread over several weeks, some time for members of the team to check or research some points that arose and time to complete the forms.

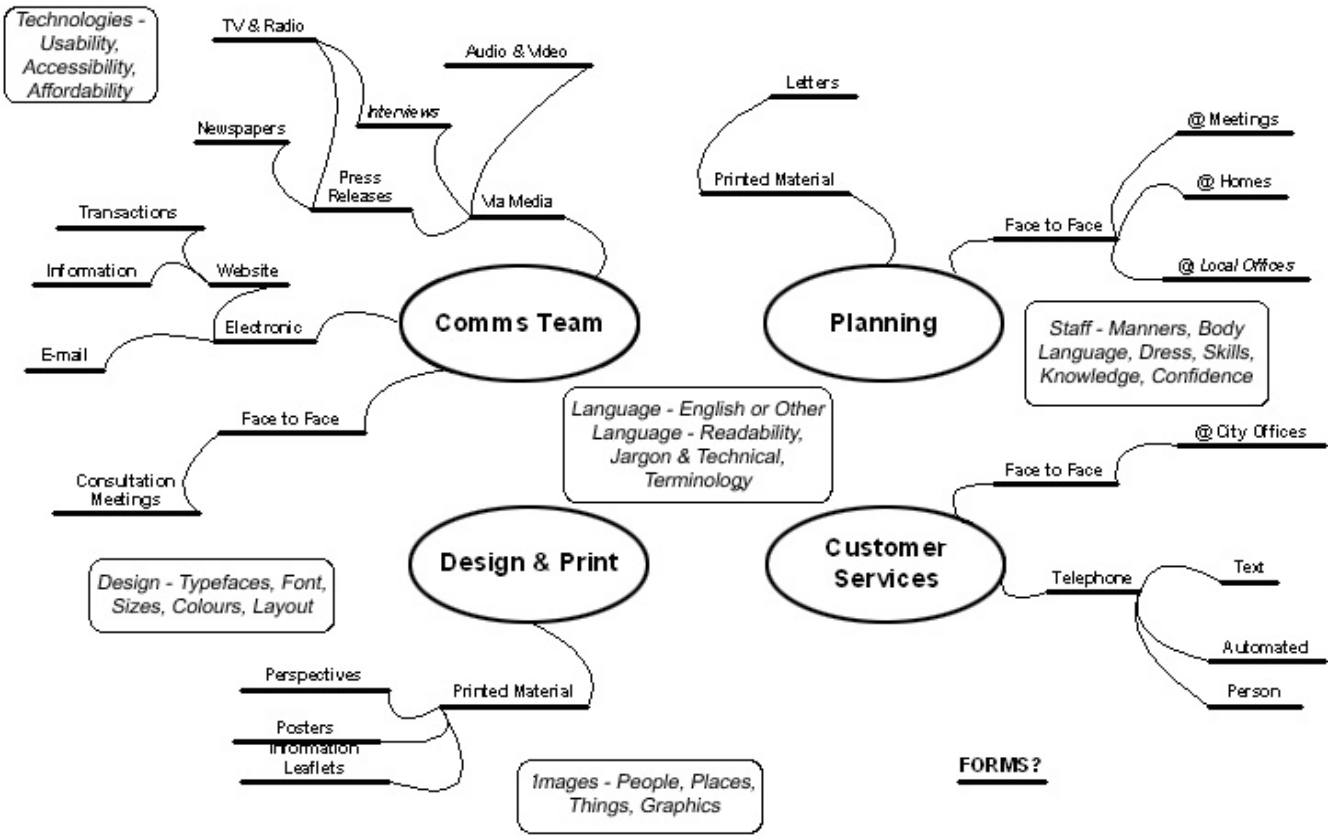
2. Process

The EIA system has really been designed to be used in relation to services or specific strategies or policies, rather than to cover a set of activities such as all the different forms of communication used by the Council. It was therefore necessary during the Scoping stage to carefully identify what exactly the EIA would cover. This was done by undertaken using a two-stage mind mapping process to help focus discussions.

The Team initially decided to concentrate on external communications and first Mind Map identified the main channels and methods used to communicate with customers.



Following further discussion, the team decided to explore the issues using 4 departments or parts of the organisation and the 2nd Mind Map shows how we initially proposed to do this. In the event, due to the absence of anyone with direct experience of Planning, we concentrated on just 3 and tackled the issue of forms as part of both the Communications Team (forms on the website) and Design & Print's (printed forms) responsibilities.



Discussions focussed on 6 key areas and the work was divided up between different members of the group, with one person being responsible for completing the paperwork: mainly the table of "customer groups" in Template 2. As we identified what the assessment would cover, we also began to identify some potential key outputs/outcomes which are shown below in italics.

- The website and related electronic transactions (including e-mail) – Comms Team. *Website has been highlighted as having accessibility problems in 2008 Socitim report. Accessibility Policy to be written to ensure conformity when new design goes live. Common format/style for e-mails. Plain English guidance & enforcement.*
- Telephone contacts (including automated services) - Customer Services. *Guidance/procedure on use of interpreters – see Interpretation & Translation Policy.*
- Consultation meetings – Comms Team. Guidance/*Checklist for meeting organisers.*
- Face-to-face contacts – Customer Services. *Guidance on use of interpreters – X-ref Interpretation & Translation Policy. Improved signage to council offices.*
- Printed materials (including Perspectives, Posters, Leaflets & Forms) – Design & Print. *Plain English guidance & enforcement. Improved form design – help message. Review font size & other visual impairment issues.*

- Cabinet Papers. *Plain English guidance & enforcement in relation to Executive Summaries.*

In each case, the whole Team (or as many of the team able to attend a particular meeting) used the questions and table in Template 1 of the EIA Guidance Manual to explore whether or not a particular form of communication was accessible to everyone and, if there were barriers to some groups using it, if these could practically be removed.

Our key premise throughout was as follows:

It would not be practical, affordable or – probably – possible to make *all* forms of communication completely accessible to everyone. If a particular form of communication is not accessible to a particular group or groups this is acceptable *providing* that there is *either* a suitable alternative and that alternative is readily available *or* appropriate help is provided to enable customers to obtain information, receive a service or participate in a consultation.

In deciding if a customer group would or might have a problem in relation to the key areas the assessment looked at, we based our conclusions on the following:

- Findings of the Audit Commission's recent access audit.
- Monitoring evidence where this was available – including complaints.
- Information about the needs/barriers faced by particular groups drawn from national organisations such as RNIB, relevant standards (e.g. website accessibility standards), available research and guidance from governmental, academic and other sources.

3. Findings

As the assessment proceeded, 3 types of issue arose:

- Opportunities for improvements that require action by all or most parts of the council.
- Issues that needed addressing in relation to specific activities or by services.
- Communications issues that individual services will need to look at in detail when doing their EIAs.

In the end, we concluded that in 5 out of the 6 areas covered no detailed assessment was required and an improvement plan for these areas could be developed. (See Section 5.)

N.B. The scoping stage of the EIA did identify accessibility issues around:

a) Customers whose first language was not English and the need for interpretation and/or translation;
b) Customers with sensory impairments – particularly visual impairments who needed documents or information in other formats; and
c) Customers with poor literacy and numeracy.

The first two issues have already been dealt with by the development and implementation of the Interpretation & Translation Policy and its associated procedure. Part of this work entailed producing some information and guidance on the communications needs of people with sensory impairments, which is available on the intranet.

The team felt that customers with poor literacy would be identified and offered appropriate assistance by staff – or, for example in the case of people with learning disabilities, would receive it from carers and/or the services or agencies that supported them.

In the 6th area – the various forms of "consultation meetings" – the team felt that further research was required to better understand the needs of some significant customer groups and therefore a detailed assessment was required. This will be undertaken early in 2008-09. (See Section 5 for further details.)

The assessment identified a number of opportunities to improve communications across the whole Council. The most significant are listed below and further work will be required to explore the practicality and resource implications of implementing them.

4.1 Key Recommendations for general/corporate improvements:

1. Develop corporate equality monitoring standards. Including common explanation of why data is being asked for and how it will be used. (N.B. This doesn't imply all services need to monitor all 6 equality strands all the time.) **[Action/Method:** Action Learning Set. **Responsibility:** Head of Organisational Development.**]**
2. Develop a standard process planning model for all consultation/involvement processes. (See following recommendation.) **[Action/Method:** Task & Finish group. **Responsibility:** Head of Organisational Development.**]**
3. Undertake outreach activities as standard in all consultations. **[Action/Method:** Use standard process model. **Responsibility:** Heads of Service.**]**
4. Promote use of Plain English where possible. (Training/Learning required.) **[Action/Method:** Include in corporate training programme. **Responsibility:** Head of Organisational Development, supported by Learning & Development Adviser.**]**
5. All Cabinet/committee papers to have a genuine Executive Summary written in Plain English. (Training/Learning required.) **[Action/Method:** Vet all reports. **Responsibility:** Heads of Service.**]**
6. Improve signage to Council Offices from key points in town. (Same for new local offices.) **[Action/Method:** Install additional signs or maps. **Responsibility:** Head of Access & Infrastructure.**]**
7. Include equality and communications issues in the induction process. **[Action/Method:** Include section in staff handbook and induction briefing. **Responsibility:** Head of Organisational Development.**]**
8. Integrate equality awareness and customer service training for all customer-facing staff and members. (As part of.) **[Action/Method:** develop a customer care training/learning programme that includes equality. **Responsibility:** Customer Services Manager Service, supported by Learning & Development Adviser.**]**
9. Develop call handling protocols/procedures to ensure "warm transfers" of calls from Customer Services to other departments and within and between departments. **[Action/Method:** develop and implement an appropriate protocol/procedure. **Responsibility:** Customer Services Manager Service.**]**
10. Use auditors to monitor corporate standards in relation to equality via spot checks and use of league tables (Link to Business/Service Plans and appraisal system.) **[Action/Method:** tba. **Responsibility:** Audit Manager.**]**
11. Develop corporate guidance on including Equality in contract tendering and monitoring procedures. **[Action/Method:** Determine suitability of approach developed by West

Midlands Purchasing Consortium and adopt if appropriate. **Responsibility:** Head of Performance and Scrutiny, supported by Procurement Officer.**]**

12. Free-up IT access for public access computers to enable linking to other appropriate organisation's web pages for advice, information, etc. **[Action/Method:** tba. **Responsibility:** Head of IT.**]**

4.2 Flag-ups:

The assessment also identified the following 3 points where immediate improvements could be made at little or no cost:

1. Add equality skills and knowledge to the appraisal process**. [Responsibility**: Organisational Development.**]**
2. Recruitment and Public Access/Planning portals – review operation of accessibility options. **[Responsibility**: Head of Planning & Head of Organisational Development.**]**
3. Services to identify and disseminate - via ICE group - good practice in relation to face-to-face contacts. **[Responsibility**: ICE working group members.**]**

4.3 Service specific issues:

In order to reach Level 3 of the Equality Standard for Local Government, Business/Service plans need to include specific equality actions & targets that have been developed, in part, on the basis of EIAs and in consultation with customers. This generic Communications impact assessment identified a number of issues that individual services will need to look around *their* service-specific communications when doing EIAs:

1. Understanding the needs of their customers.
2. Producing targeted publications to reach particular audiences.
3. Using other access channels as well as the website.
4. **Always** signposting other access channels and how to get help.
5. Creative use of audio & visual options on the website.
6. Appropriate equality monitoring systems.

5. Conclusions.

5.1 Detailed Assessment

A detailed impact assessment is required on:

Planning and undertaking workshops, consultation events and other public meetings.

This requires:

- Research into the barriers that prevent participation by some customer groups.
- Improving understanding of the communication needs of specific customer groups.
- Review of available venues.
- Review of available support/assistance (from local groups and/or other agencies) for specific customer groups.
- Development of guidance/checklist for event organisers.

5.2 Improvement Plan

Fifteen Key Actions were identified to address the issues that arose during the assessment. These are summarised in the table below, which also identified who is responsible, if work is already underway, appropriate targets, and resource implications.

5. Improvement Plan for Communications:

Key Actions	Responsibility	Underway	Target	Resource Implications
1. Improve Website Design (Home Page must comply with highest accessibility standards) and ensure visual and audio features comply with good practice.	CCM	Complete	July 2008	Included in costs of planned update.
2. Ensure ongoing compliance with (constantly improving) relevant accessibility standards by: (a) introducing new corporate standards as part of an Accessibility Policy (b) consistently monitoring against W3C standards and (c) implementing regular user testing of new content.	CCM	a) complete b) on-going c) planned for Feb 09	September 2008	Time required to set up regular testing
3. Improve website search facility.	CCM	Complete	July 2008	Part of planned update
4. Review other websites including Visit, Museums Collections, Planning Portal and WDSP and ensure compliance with new accessibility standards.	CCM	Yes	March 2009	Updates required for specific templates may incur a cost to change Training implications
5. Use a wider selection of images in publications and on the website to reflect the whole community.	CCM & D&PM	Yes	On- going	Cost of new stock images
6. Promote equality of disabled people by using positive images and stories.	CCM	Yes	On- going	Part of existing work programme
7. Provide guidance on use of language/terminology in relation to minorities.	HOD	Yes	On- going	
8. Review corporate typeface (use a serif type) and font size (> to 12 for body text on letters, etc. with key messages in at least 14pt.)	CCM & D&PM	No	June 2008	Roll out of new corporate standard

Key Actions	Responsibility	Underway	Target	Resource Implications
9. Change letter templates to ensure compliance with new corporate typeface, font size and use of subject lines.	CCM	Progressing		Enforcement of new standards
10. Change e-mail templates to ensure compliance with new corporate typeface, font size, etc.	CCM	Complete		Enforcement of new standards
11. Comms Team & Design & Print to enforce good practice i.r.t. plain English, design issues re. readability, prominence of “help” and “key content” messages on publications and forms.	CCM & D&PM	Yes	On- going	Plain English Training
12. Adopt standard “Help” wording on all publications, letters, forms, etc. and explore development of “Help” Icon or Logo.	CCM & D&PM	No	September 2008	Design time
13. Gauge equality awareness/knowledge of staff (and members?) using e-polling.	HoD & CCM	No	On- going	Design Time and Analysis Time