

Public access to West Suffolk Council offices – Equality Impact Assessment

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Part one – Screening Equality Impact Assessment

Question	Response
1. Name of the strategy, policy, programme or project being assessed.	West Suffolk Council - arrangements for customer access to buildings following COVID-19 closures.
2. In no more than five lines and using plain English, summarise the purpose of the policy or proposal and its desired outcomes.	<p>A proposal that: where face-to-face customer contact is necessary, it is provided online or virtually, by telephone, or as pre-arranged appointment(s), with no drop-in services available across West Suffolk Council’s office buildings.</p> <p>The proposal does not apply to:</p>

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	<ul style="list-style-type: none"> • visitor management at West Suffolk House (for staff and councillor meetings and meetings managed by Democratic Services and partner agency meetings) • public access to statutory documents (for elections and so on) • contact with regulatory services which will continue in homes and business premises • leisure and cultural buildings (for example, Apex, Moyses Hall).
<p>3. Who should benefit from the proposal and in what way?</p>	<p>The following groups are likely to benefit:</p> <ul style="list-style-type: none"> • customers who are less able to physically access council buildings, due to work patterns, transport availability or physical disabilities, will benefit from the improved online, telephone or virtual offer • all West Suffolk Council tax payers, through more efficient use of resources and through reduction in environmental impact due to reduced travel to council buildings • vulnerable customers who have previously been wrongly advised by partner organisations to access the Council offices but then cannot be properly helped • all building users, due to a reduction in incidents arising from distressed or disruptive customers needing to be supported and dealt with, including a reduction in attendance by police.
<p>4. Is there any evidence or reason to believe that, in relation to this proposal, there may be a difference in:</p> <ul style="list-style-type: none"> • levels of participation • uptake by different groups • needs or experiences of different groups • priorities • other areas 	<p><u>Without</u> appropriate mitigations and communication, the impact of the above proposal may be experienced negatively by those from the following groups:</p> <ul style="list-style-type: none"> • individuals who have poor or no Internet access • individuals for whom English is not their first language, who prefer face to face contact • individuals who have physical or learning disabilities or mental health issues that mean they prefer face to face contact • vulnerable individuals in crisis who have found it hard to navigate the public sector system.

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Question	Response
	<p>Data showing the most common reasons for customers coming into West Suffolk Council office buildings in person give the following top issues:</p> <ul style="list-style-type: none"> • housing (and homelessness) • Council Tax • benefits • licensing <p>It is therefore also important to consider whether customers who are 'dropping in' to council buildings for advice and support on these issues include a higher proportion of individuals from groups with protected characteristics than the West Suffolk population as a whole.</p> <p>Specific data are not available to answer this question directly. However, proxy data can be used, as follows:</p> <ul style="list-style-type: none"> • While black and minority ethnic (BME) groups make up 4.8 per cent of Suffolk's population, they make up 9.6 per cent of the Job Seekers Allowance (JSA) claimant group. At national level, 14.6 per cent of England's population are of BME background, while 25.5 per cent of JSA claimants are from this group at national level (Department for Work and Pensions, 2018). Given the link between Job Seekers Allowance and other benefits issues referenced above, including Council Tax discount, it could therefore be the case that a higher proportion of individuals seeking face to face advice on these issues in West Suffolk could be from a BME background. • The proportion of taxi drivers and owners of food premises for whom English is not their first language is significantly higher than the West Suffolk population as a whole. It could therefore be the case that a higher proportion of these individuals are from non-white ethnic

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	backgrounds. This is supported by Department for Transport data: Taxi and private hire vehicle statistics, England and Wales: 2017 which found that the two main ethnic groups of drivers at the national level were White and Asian or Asian British, making up 47 per cent and 38 per cent of drivers respectively.
<p>5. Using the evidence listed above, fill in the table below to highlight the groups you think this policy or proposal has the potential to impact upon:</p> <ul style="list-style-type: none"> • Is there any potential for negative impact? • Are there opportunities for positive impact or to promote equality of opportunity? 	

Impacts table

	Is there potential for negative impact?	Are there opportunities for positive impact?	If yes, please provide details of the impact below	
			Positive impact	Negative impact
All groups or society generally				
Age – Older or younger people	Yes	Yes	See answer to Question 3 (Q3) above	Older people who previously relied on 'dropping in' to council buildings may find accessing services online more challenging due to less access to the Internet and poorer digital skills. They

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				may also be less likely to hear about the changes in advance.
Disability - People with a disability, including those living with dementia	Yes	Yes	See Q3 above	Without appropriate support being in place, customers with physical or learning disabilities or mental health issues affecting communication may find it more challenging to access services online or by telephone, compared to face to face contact.
Sex - Women or men	No	Yes	See Q3 above	Not applicable
Pregnancy or maternity - including expectant or new parents	No	Yes	See Q3 above	Not applicable
Marriage and civil partnership – including same sex couples	No	Yes	See Q3 above	Not applicable
Race - People who are black or from a minority ethnic background (BME)	Yes	Yes	See Q3 above	As for answer to Question 4, the customers most likely to be impacted by the proposals may include a higher proportion of individuals from a BME background.
Religion - People with a religion or belief (or who choose not to have a religion or belief)	Yes	Yes	See Q3 above	Not applicable
Sexual orientation - People who are lesbian, gay or bisexual (LGB) or in a civil partnership	No	Yes	See Q3 above	Not applicable

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Gender reassignment - People who are transitioning from one gender to another	No	Yes	See Q3 above	Not applicable
Families and those with parenting or caring responsibilities (The Families Test)	No	Yes	See Q3 above	Not applicable
People on a low income	Yes	Yes	See Q3 above	Lower income households may have poorer access to the internet
People suffering rural isolation	Yes	Yes	See Q3 above	A lack of access to the internet through poor rural broadband may impact on customers' ability to confidently access services online. Ofcom data from 2019 showed that between 4 and 5 per cent of West Suffolk's rural areas were unable to receive 2 Megabits per second (Mbps) broadband, compared to 0.1 to 0.8 per cent of the urban areas.
People who do not have English as a first language	Yes	Yes	See Q3 above	Customers who do not speak English as a first language may not feel confident in dealing with services online or by telephone and may prefer to speak face to face. While this will still be possible by appointment, the arrangements for making appointments need to be suitable for this group. Language Line is available to support where appropriate.

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6. Considering your answers to question five above, do you believe a full EqIA is necessary?	Yes
7. Considering our duty to proactively tackle disadvantage and promote equality of opportunity, list the actions required in the table below.	

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Action Plan

Equality group or characteristic	Action or milestone	Responsibility (Project manager or partner organisation)	Achievement date	Monitoring arrangements
All listed above who may experience a negative impact	Further consultation with West Suffolk services and partnership organisations, plus representatives of all affected groups (see full EqIA)	Public Access Group (staff group)		

Sign off section

This Screening Level EqIA was completed by:

Name Liz Barnard

Job Title Service Manager, Corporate Policy

Date June 2021

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Part two – Full Equality Impact Assessment

Question	Response	
Summary		
1. Name of the strategy, policy, programme or project being assessed.	West Suffolk Council - arrangements for public access to council office buildings following COVID-19 closures.	
2. In no more than five lines and using plain English, summarise the purpose of the policy or proposal, and its desired outcomes.	<p>A proposal that: where face-to-face customer contact is necessary, it is provided online or virtually, by phone, or as pre-arranged appointment(s), with no drop-in services available across West Suffolk Council’s office buildings.</p> <p>The proposal does not apply to:</p> <ol style="list-style-type: none"> 1. visitor management (for staff meetings and meetings managed by Democratic Services) 2. public access to statutory documents (for example, for elections) 3. contact with regulatory services which will continue in homes and business premises 4. leisure and cultural buildings (for example, Apex, Moyses Hall). 	
Evidence		
3. What does the current evidence tell us about possible inequalities in relation to this proposal?	Equality group or characteristic	Issue(s)
	Older people	See Screening EqIA
	Disabled people	
	People from a BME background	
	Low income households	
People suffering rural isolation		

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	People who do not speak English as their first language		
Consultation			
4. How do you plan to seek the views of the groups outlined above?	Method	Complete?	
	General consultation event (open to all)	Not the preferred method	
	Use regional Equality Networks	Not the preferred method	
	Specific and targeted consultation workshop	Not the preferred method	
	Seek specialist advice from relevant organisations	We will engage with representative groups to ascertain: <ul style="list-style-type: none"> • What has been the impact on the customer groups listed in Q3 above during 2020 to 2021? • What further measures (if any) need to be put in place to maximise the accessibility of council services to these groups? 	
	Commission research	Not the preferred method	
	Other (please detail)		
Consultation results			
5. Using the table below, summarise the results of the consultation exercise (attach full records of consultation carried out).			
Consultation results	Please outline each impact (positive or negative) identified through the consultation process	Impact Negative, positive or neutral?	Evidence The process should have highlighted new information, for example: secondary research or anecdotal experiences of individuals from specific groups.

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ACE Anglia (Advocacy for people with learning disabilities)	Very little obvious impact. ACE has made significant progress in supporting clients and accessing Council services through use of technology platforms (for example, video meetings) and does not perceive problems with the proposals.	Neutral	Operational feedback.
Suffolk Coalition of Disabled People (SCDP)	Very little obvious impact. An online-only service would be a concern; however, the ongoing presence of a contact centre was reassuring. SCDP will continue with digital support for clients.	Neutral	Anecdotal feedback.
Dementia Alliance	An online only service offer would be a concern, the ongoing presence of a contact centre was well received and reassure the customer group.	Neutral	Anecdotal feedback
Citizens Advice (CA)	Very little obvious impact. Proposals match CA's proposed operating model (appointments only).	Neutral	Anecdotal evidence based on CA client group, which included individuals with protected characteristics.
Department for Work and Pensions (Jobcentre)	Very little obvious impact.	Neutral	Operational feedback. DWP offices located in West Suffolk Council buildings (Mildenhall and Haverhill) remained open during COVID lockdown, and did not witness adverse impact from Council services not being available face to face.

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Decision – final outcome	
Based on the results of this full EqIA, please select how this policy or proposal will be taken forward:	
Implement policy or proposal without making any changes	No
Implement policy or proposal but take action (listed below) to address impacts identified	Yes
Implement policy or proposal as a pilot and monitor for impact	No
Abandon policy or proposal and redesign with involvement of specific groups from the outset	No

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Action plan				
Equality group or characteristic	Action or milestone	Responsibility (Project manager or partner organisation)	Achievement date	Monitoring arrangements
All groups who may be negatively impacted by the proposals	Effective communication of the change (see Appendix 1).	Public Access Group	June	
	Training or awareness raising of West Suffolk Council staff and staff in partner organisations to signpost customers to the right support, including appointment arrangements. This needs to include arrangements for accessing statutory documents held by Elections and Democratic Services.	Public Access Group		
	Testing of website to ensure accessibility of virtual services, telephone appointments or face to face appointments to groups listed.	Public Access Group		
	Alternative arrangements for paperwork – getting forms signed, scanning.	Public Access Group		
	Effective transition arrangements, while new arrangements are implemented, for example, Facilities Management support.	Public Access Group		
	Ensure arrangements for translation and interpretation services are understood and communicated effectively to all staff and onsite partner organisations. Continue to use Language Line.	Public Access Group		

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Sign off section

This EqIA was completed by:

Name Liz Barnard

Job title Service Manager, Corporate Policy

Date **June 2021**

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Appendix a: Communicating the change in public access arrangements – proposed methods, drawing on equalities considerations

Group or Characteristic	Communication method	Detail
People with little or no Internet access	Notice or advert in a publication	<ul style="list-style-type: none"> • Newspapers • Parish magazines • Community newsletters • Local commercial magazines ('Directory') • School newsletters
	Notice on a noticeboard	<ul style="list-style-type: none"> • Local services – GP, pharmacy, small shops, supermarkets, library, post office, churches • Community or parish noticeboards
	Phone book	Phone number listed in phone book.
Disabled people and their carers		
General	Email to disability groups, including those representing people with specific disabilities	For example: <ul style="list-style-type: none"> • Suffolk Coalition of Disabled People • Suffolk Family Carers • Suffolk County Council Assisted Technology Team • Local community groups
	Social media	
People with visual impairment	Talking newspaper	For people with visual impairments: <ul style="list-style-type: none"> • St Edmundsbury Newstalk • Fenprobe
People with hearing impairment	Email to organisations supporting service users, asking them to inform staff and service users	<ul style="list-style-type: none"> • Local groups such as Bury Deaf Association • Captioned video • Note: publicise Text talk number
People with autism spectrum disorders, dementia, or learning disabilities	Email to organisations supporting service users, asking them to inform staff and service users	For example: <ul style="list-style-type: none"> • National Autistic Society (West Suffolk Group) • Dementia Alliance and local dementia groups • Ace Anglia

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<p>People with English as an Additional Language</p>	<p>Email to local community groups, asking them to communicate, including translating the messaging into the relevant language</p>	<ul style="list-style-type: none"> • Use information from Families and Communities and Census engagement • Signpost to Translation Services (Language Line) • Tailor approaches where we have a large group with English as an Additional Language (for example, licensing).
<p>Service users (including people on low incomes)</p>	<p>Email to organisations supporting service users, asking them to inform staff and service users</p>	<p>Public sector</p> <ul style="list-style-type: none"> • Integrated neighbourhood teams • Police • Hospital (including Wedgewood unit) • Clinical Commissioning Group • Probation • GPs • Suffolk County Council – social care • Anglia Revenues Partnership • Independent Wellbeing Service <p>Voluntary sector</p> <ul style="list-style-type: none"> • Gatehouse • Registered providers • Reach • Foodbanks • Community Action Suffolk • Bury Drop In • Other groups on Families and Communities Team lists <p>Service users</p> <ul style="list-style-type: none"> • Taxi driver forum • Houses in Multiple Occupation landlords • Agents, architects
<p>All groups – wide communication</p>	<p>Social media</p>	
	<p>Email Inclusion in regular communication methods</p>	<ul style="list-style-type: none"> • Councillors • Parish and town councils • Suffolk Association of Local Councils • Business improvement districts • Chambers of commerce • Residents associations