Equality Impact Assessment [version 2.9]

Title: **Telephony Replacement Project**	
☐ Policy ☐ Strategy ☐ Function ☐ Service ☒ Other [please state]	☐ New ☐ Already exists / review ☒ Changing
Directorate: Resources	Lead Officer name: Rizwan Tariq
Service Area: Citizen Services, IT, Council-wide	Lead Officer role: Head of Citizen Services

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here Equality Impact Assessments (EqIA) (sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Equality and Inclusion Team early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The project has been initiated as part of the Digital Transformation Programme within IT to deliver a full replacement and modernisation of the Council's contact centre technology; focussed on initially increasing core operational stability and reliability, moving to full omni-channel and channel blending capabilities to improve the citizen experience and increase options around contact channels. The project will also deliver internet-based telephony through Microsoft Teams for all staff within the organisation, and decommission existing, outdated or end of contract technology and close related contracts.

The key aims of this project are:
1) To procure and implement a fully hosted, SAAS (Software As A Service) contact centre solution that has the capability to offer the Council improved stability and reliability for both staff and citizens as well offering a wider range of contact options (omni-channel) to modernise the citizen offer and support the Council's Channel Shift Strategy.
2) To procure fully hosted infrastructure components through an IAAS model (Infrastructure As A Service) to enable the implementation of direct routing through pre-existing Microsoft Teams licences for both inbound and outbound staff telephony (replacing traditional network telephony with internet-based (IP) telephony). Provision of handsets (hardware) within the organisation where required e.g. reception desks
3) Post-implementation, to decommission all on premise technology from incumbent solutions, close all elements of existing contracts relating to this project (some Virgin/Centrex contract components)

1.2 Who will the proposal have the potential to affect?

☒ Bristol City Council workforce	☒ Service users	☒ The wider community
☐ Commissioned services	☐ City partners / Stakeholder organisations	

Additional comments:

The change will affect the following groups in the following ways:

1. **Bristol City Council workforce:**
   a. For Citizen Services Staff – increased stability of core system / increased flexibility for home- and hybrid-working practices (hosted system), wider range of contact channels and opportunities to resolve service requests more efficiently through full contact blending enabled technology
   b. For wider BCC staff – ability to make internet-based outbound calls (internal and external) and receive inbound calls (internal and external) through Microsoft Teams on their laptops without the need for handsets or mobile telephones, as well as being able to redirect calls to an alternative chosen device, add personalised messaging and be part of a team hunt group if appropriate increasing the flexibility of home- and hybrid-working practices.
2. **Service users and wider community**: increased flexibility and choice in how to contact/interact with the Council to resolve queries, issues or service requests through the broadening of contact channels in the new contact centre solution. This could be through any or all of the following channels: telephony, SMS, email, social media, web chat, bot or by starting the contact on one channel and being given an option to change to a different channel mid contact. Modernising BCC's range of contact channels as well as maintaining traditional channels for those who prefer to use them through the replacement contact centre solution either out of choice or necessity. The contact channels available through the contact centre solution will complement other existing channels such as face-to-face and digital self-service.

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

☒ **Yes**   ☐ **No**   [please select]

It is anticipated that the overall aims of this project will be positive but do represent a change, through:

1. broadening opportunities for both staff and citizens to contact each other to resolve queries and service requests through the introduction of new/modern contact channels such as Web Chat, Bot, SMS, Video Chat as well as creating additional stability and resilience within pre-existing channels such as Telephony, Email and Social Media.
2. offering greater flexibility in how citizens choose to contact the Council through the introduction of more contact channels, as well as the opportunity to change channel mid contact. This aligns with the Corporate Channel Shift Strategy (will provide link at later time) in enabling the Council to shift citizen contact to more cost-effective channels whilst maintaining traditional channels for those who prefer them. The new solution should enable contact blending for staff, enabling seamless transference of contact handling from one channel to another within a sift (dependent on settings/specialisms etc.)
3. fully hosted (and externally supported) solutions and infrastructure will better enable home- and hybrid-working practices for staff, creating more stable and flexible service provision.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: https://www.bristol.gov.uk/people-communities/measuring-equalities-success .

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here Data, statistics and intelligence (sharepoint.com). See also: Bristol Open Data (Quality of Life, Census etc.); Joint Strategic Needs Assessment (JSNA); Ward Statistical Profiles.

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as HR Analytics: Power BI Reports (sharepoint.com) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the Employee Staff Survey Report and Stress Risk Assessment Form

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Report held by IT with the numbers of BCC employees who use accessibility software by type	e.g. #s for Claro Plus Dolphin Supernova Dragon Professional Global Auto Correct Inspiration JAWS Mind View RSI Guard Text Help Read and Write
Website accessibility - bristol.gov.uk	The Council's web accessibility statements currently says: • We provide a text relay service for people who are d/Deaf, hearing impaired or have a speech impediment but you can speak to our team using BT's text relay app • Phone lines are open 8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm Friday. • Sign Video British Sign Language (BSL) Interpreting BSL Interpreting is available Monday to Friday from 9am to 5pm.
Quality of Life 2020-21 — Open Data Bristol	• Disabled people; older people; carers; tenants in Council and HA rented accommodation; people with no qualifications and those living in most deprived areas of the city are less likely to feel comfortable using digital

	services
	• Young people 16-24; tenants in Council and HA rented accommodation; carers; single parents; disabled people; and LGBT people in Bristol are less likely to have enough mobile data
	• Older; disabled; people in Council accommodation; and those with no qualifications are less likely to have internet at home.
[Bristol key facts:](#) / [Projecting Older People Population Information System (poppi.org.uk)](#)	Overall population estimates for adults in Bristol indicate around 5,570 people have a moderate or severe visual impairment in 2018, and 6,400 are estimated to have severe hearing loss (with over 60,200 people estimated to have some level of hearing loss).
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

☒ Age	☒ Disability	☒ Gender Reassignment
☒ Marriage and Civil Partnership	☒ Pregnancy/Maternity	☒ Race
☒ Religion or Belief	☒ Sex	☒ Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

We have diversity data for employees and a corporate approach to diversity monitoring for services which included protected and other relevant characteristics. However we know there are gaps in available information especially where this has not historically been included in statutory reporting.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See https://www.bristol.gov.uk/people-communities/equalities-groups.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure (sharepoint.com)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

At this stage we have carried out internal engagement with relevant teams and business partners, but further engagement is planned specifically with the Disabled Colleagues Network about how they would like to be involved

in this, as well as talking with translation and interpretation team and sensory support team. This engagement will continue through the current FBC stage and beyond into delivery to ensure we are fully aware of impacts and amendments required.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We have included a range of functional and non-functional requirements in our tender pack to ensure that we can best evaluate vendors on how they meet our needs, specifically in terms of staff groups with accessibility requirements for system/app use as part of their role, and for citizens to have a range of channel option to choose how to engage with the Council that best suits their needs. Any subsequent proposals which were likely to impact on workforce would be subject to staff consultation in accordance with our Managing Change Policy.

Further engagement is planned specifically with the Disabled Colleagues Network about how they would like to be involved in this, as well as talking with the Translation and Interpretation team, sensory support team and the Web team. This engagement will continue through the current FBC stage and beyond into delivery to ensure we are fully aware of impacts and amendments required.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. Equality Impact Assessments (EqIA) (sharepoint.com)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS   (highlight any potential issues that might impact all or many groups)

The change will affect the following groups in the following ways:

1. **Bristol City Council workforce:**
   For Citizen Services Staff – a wider range of contact channels and full contact blending enabled technology will require sufficient training to be provided on the new platform before it goes-live as well as training on any subsequent changes and updates to the platform components. This training will need to be made available centrally to ensure that staff on maternity/paternity leave have access and feel fully supported in the changes. Training and roll-out approaches are being evaluated as part of the tender, and ACM tram internally have been engaged to provide support on best practice approaches to ensure this is covered.

PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Age: Older People	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	BCC's channel shift strategy towards digital offerings could be seen as impacting older people with less propensity to using these channels, however this proposal is not closing traditional contact channels such as telephony and face-to-face.
Mitigations:	N/A
Disability	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐
Potential impacts:	Introduction of web-based channels such as IVR, bot, web chat may have an impact on staff with accessibility needs and those staff may not be able to incorporate those channels into their skill set, as well as being seen to be disadvantaging citizens who are unable to use these channels due to disabilities preventing their use.
Mitigations:	Further engagement scheduled with the Disabled Colleagues Network, Translation and Interpretation service and Sensory Support team.
Sex	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Race	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	Access to technology to access new channels such as web chat, social media may be hindered disproportionately affecting people from deprived areas from experiencing the same level/speed of service as needing to rely on traditional channels such as telephony and face-to-face which may be less immediate (depending on service levels, queue lengths, SLA's etc.)
Mitigations:	Need to take advice on how to mitigate this and understand this impact better
Carers	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	N/A
Mitigations:	N/A
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g.	

Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

This proposal offers increased flexibility and choice in how to contact/interact with the Council to resolve queries, issues or service requests through the broadening of contact channels in the new contact centre solution. This could be through any or all of the following channels: telephony, SMS, email, social media, web chat, bot or by starting the contact on one channel and being given an option to change to a different channel mid contact. Modernising BCC's range of contact channels as well as maintaining traditional channels for those who prefer to use them through the replacement contact centre solution either out of choice or necessity. The contact channels available through the contact centre solution will complement other existing channels such as face-to-face and digital self-service.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:
N/A
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:
Greater scrutiny of functional and non-functional requirements from both the staff and citizen user perspective to ensure the Council is procuring goods and services that uphold and support the Public Sector Equality Duty and that delivery planning is done in conjunction with staff led groups who can inform and support optimum results for the transition on the technology being implemented as part of this proposal.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
TBC		

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

TBC – under discussion as part of the FBC stage

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director[1].

Equality and Inclusion Team Review:	Director Sign-Off:
Date: 6th March 2022 (initial draft)	Date: TBC (further iteration pending)

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[1] Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.