



Equality Impact Assessment: Draft Digital Customer Strategy: Report on Consultation and Recommendations.

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive 7 November 2023	Draft Digital Customer Strategy: Report on Consultation and Recommendations.	Adoption of the Digital Customer Strategy 2023-2025, along with the intended outcomes and priority actions proposed.	Those with barriers to digital engagement. Research commissioned by ECC suggested that 10-15% of the population may face some barriers to digital engagement

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Positive & Negative	Medium	Digitisation has the potential to improve engagement with potentially marginalised groups. However, where this characteristic intersects with age and/or deprivation factors, the ONS suggests these groups may experience greater than average barriers to digital inclusion, particularly where English is not spoken as a first language
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Positive & Negative	Medium	High quality digital services have the potential to better engage those whose disability may mean encountering barriers to accessing services through in-person or voice channels. However, where disability intersects with other factors, such as access to employment, there may be increased risk of digital exclusion. In 2020 81% of disabled adults were regular internet users compared with 92% of all adults.

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Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Sex/Gender	Negative	Low	Nationally, woman are consistently less likely to access the internet, which may mean there is a low impact from further digitisation of services. However, this gap is significantly lessening year on year and in 2020 was 2%.
Gender reassignment	Neutral		
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral		
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral		
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive & Negative	Medium	ECC's commissioned research reported that 9.9% of Exeter households are likely to not have access at home due to their age. However, the related consultation shows that over 44% of responders were over 70 years, with the vast majority in support of effective digital services.
Pregnancy and maternity including new and breast feeding mothers	Neutral		
Marriage and civil partnership status	Neutral		

Actions identified that will mitigate any negative impacts and/or promote inclusion

Our Research

As part of the Digital Customer Service Strategy work programme ECC have commissioned a report investigating barriers to digital inclusion for Exeter residents. It found that risk factors for a lack of home internet connectivity are age, social grade and employment status.

Our research highlights that the main causes of digital exclusion are:

- Digital Skills – Those who do not have the skills or confidence to access digital services.
- Data and Connectivity – Those who do not have access to an internet connection.
- Devices - Those who do not have the devices needed to access digital services
- Motivation or attitude – Those who are unwilling to use (some) digital services.

Actions

In response, we will:

- Use the insights from the research commissioned research into the extent and impact of digital inclusion barriers in Exeter to develop a digital inclusion plan, ensuring there is clarity regarding the goals and measures associated with this plan.
- Ensure there are always alternative routes for those unable to contact digitally and that these are simple to use and easy to understand, ensuring equal opportunity access to services.
- Design services and create a channel mix that allows us to spend more personal contact time with those who need extra support, due to their needs and/or the complexity of their enquiry.
- Ensure that customer inclusion is a goal of any centralised Customer Experience function, with clear responsibility at the strategic level.
- Ensure that service design aligns with the Accessibility Regulations 2018 and the Equality Act 2010
- Promote the benefits of digital as a tool for inclusion and for engaging with those with protected characteristics.
- Address the current, potentially confusing, customer offer, with multiple contact points, which are not joined up and lack corporate standards around how they are delivered.
- Ensure all staff are suitably trained around equalities and inclusion and have the necessary skills and attributes to assist and enable those who cannot contact us digitally.

- Work with partners and other third parties to develop a map of, and promote opportunities for, digital skills training, (including how customers protect themselves online), and access to devices and affordable connectivity.
- Explore and apply for funding opportunities to deliver inclusion projects with tenants and other residents.
- Introduce a co-design approach to significant digital projects, which is inclusive of those individuals potentially most impacted and groups that represent them.

Web Accessibility

A well-designed website can be a powerful tool for inclusion of those with certain protected characteristics, particularly where this is a barrier to accessing services through more traditional means. Web Accessibility refers to the degree to which websites are designed so that people with disabilities can use them. It also benefits those without disabilities, such as older people with changing abilities due to aging and those who may have a slow internet connection.

- Exeter City Council's website has an accessibility score of 96.4/100
- The Silktide monitoring website ranks Exeter 40th out of 350 local government websites in the UK for accessibility.

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