

Appendix A – EIA Screening

Equality Analysis – Proposed Remodelling of Brent Customer Services

Stage 1 Screening Data

1. What are the objectives and expected outcomes of your proposal? Why is it needed? Make sure you highlight any proposed changes.

The overall proposal is for a new service operating model for Brent Customer Services (BCS) concurrent with proposed changes to the organisational structure of the unit.

The key features of the proposals are as follows:

- A move to an appointments only service for residents visiting the Customer Services Centre (CSC), with appointments only available for enquiries that cannot be resolved online, except where the customer is identified as vulnerable and unable to use on-line facilities with assistance.
- A move to digital assistance for residents phoning Brent Customer Services except where the customer is identified as vulnerable and unable to use on-line facilities with assistance.
- Active promotion of digital channels with increased support available to customers who need assistance in using these, including assistance via webchat and floor walkers in the Customer Services Centre.

These proposals support accelerated channel shift and the wider aims of Brent's Digital Strategy as well as the achievement of savings of £1m by 31st March 2018.

2. Who is affected by the proposal? Consider residents, staff and external stakeholders.

Residents – Some vulnerable residents accessing our face to face service and phone service could potentially be affected. However, as the current service offer for such residents will continue unchanged, no adverse impact is currently anticipated.

By improving our digital offer and driving channel shift, more services will be available online and "24/7". The proposed changes will not only improve convenience and ease of access for those who can self-serve but will also ensure that phone and face-to-face communication channels are targeted at the most vulnerable residents who may otherwise experience access barriers due to disability, language or knowledge and ownership of appropriate IT equipment.

Staffing – An Equality Analysis will be carried out to determine and assess any potential impact of the proposed organisational change for staff with protected characteristics once the structure and any associated implications have been determined.

External Stakeholders - Voluntary sector service providers may be approached by residents for face to face support and assistance. As indicated above, mitigations have been made to the proposals to ensure that vulnerable residents continue to receive the same level of service and access to services as at present and will not be adversely impacted.

3.1 Could the proposal impact on people in different ways because of their equality characteristics?

Yes.

- Age:
 - Customers of pensionable age who are unable to access and use online services, including those where additional assistance is required.
- Disability / long term health conditions

- Customers who face access barriers and cannot self-serve due to disabilities or health conditions. These may include but are not be limited to customers with learning disabilities, mental health conditions or severe physical disabilities or health conditions, as well as customers with hearing (incl. BSL users) and/or visual impairments.
- Race / Ethnicity - Black, Asian and minority ethnic (BAME) customers whose first language is not English
 - BAME customers that do not have English as their first language may face access barriers or be unable to self-serve without alternative languages being available for translation. Whilst the Brent Council website provides information and support in alternative languages, this does not extend to the Housing Benefit online application and MyAccount. However, the council is able to arrange translation or interpreting services and/or alternative formats for customers with language and/or disability barriers upon request.

3.2 Could the proposal have a disproportionate impact on some equality groups? If you answered 'Yes' please indicate which equality characteristic(s) are impacted

Yes – Age, disability and race/ethnicity (BAME customers whose first language is not English).

Office for National Statistics (ONS) – UK internet users, 2017 states that 99% of those aged under 34 access the internet and therefore are “digitally included”, with those aged between 55-64 being 90% “digitally included” and those aged 65 to 74 years old being 79% “digitally included”.

When comparing this to the volume of customers that applied for Housing Benefit during the pilot period of 16th June to 15th September 2017, 9% were aged under 25 years old, 48% were aged between 40 to 60 years old and 7% aged over 65 years old. Similarly, of those that reported a change to their Housing Benefit claim from 16th June to 15th September 2017, 5% were aged over 65 years old.

Of the customers that applied for Housing Benefit during the pilot period of 16th June to 15th September 2017, 6% indicated that they were disabled.

Of the customers that applied for Housing Benefit during the pilot period of 16th June to 15th September 2017, 23% declared that they received assistance with applying for their Benefit, of which 3% of this total received assistance from Brent Council staff.

3.3 Would the proposal change or remove services used by vulnerable groups of people?

There is a potential for the change to impact upon services used by vulnerable groups of people. However, it is proposed under the revised arrangements that the existing service levels and access to services will continue unchanged for vulnerable residents that fall into the protected characteristic groups.

3.4 Does the proposal relate to an area with known inequalities?

Yes – residents facing social inequality for example those in lower socio-economic groups; those in poor health and those that do not have immediate access to PC’s and the internet or the associated knowledge and experience in using them.

3.5 Is the proposal likely to be sensitive or important for some people because of their equality characteristics?

Yes

3.6 Does the proposal relate to one of Brent's equality objectives?

Yes

To ensure that local public services are responsive to different needs and treat users with dignity and respect

The proposed changes will ensure that we are continuously improving accessibility of services and enhancing our digital offer by ensuring that services are available 24/7.

Recommend this EA for Full Analysis?

No

4. Use the comments box below to give brief details of what further information you will need to complete a Full Equality Analysis. What information will give you a full picture of how well the proposal will work for different groups of people? How will you gather this information? Consider engagement initiatives, research and equality monitoring data.

The proposed re-modelling of Brent Customer Services has given due regard to vulnerable customers. It is proposed that the retention of existing service levels and access to services for vulnerable persons shall remain unchanged from the existing arrangements. Additionally, increased staff support within the CSC in the form of “floor-walkers” shall be made available to provide visiting customers with assistance in accessing online services. It is therefore not currently anticipated that there will be any adverse impact arising from the changes proposed.

6. Could any of the impacts you have identified be unlawful under the Equality Act 2010? Prohibited acts include direct and indirect discrimination, harassment, victimisation and failure to make a reasonable adjustment.

- Yes
- No

7. Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.

What did you find out from consultation or data analysis?

Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?

How did your findings and the wider evidence base inform the proposal?

Customer feedback was obtained during the “pilot” period from those that experienced the changes and who contacted Brent by phone, visited the CSC, completed an online Housing Benefit Application or reported changes in their circumstances. A total of 372 customers responded.

Of the 123 phone customers that responded, 38% were “signposted” to Brent’s online media for assistance with their enquiry and 44% indicated that they did not find the website easy to understand.

Of the 65 customers that visited our CSC and responded, 40% advised that they were confident using online services and 62% indicated that they were happy with the service they received.

Of the 45 customers that completed the online Housing Benefit Application and provided feedback, 71% indicated that they found the “MyAccount” customer portal easy to use and 84% indicated that they received sufficient information from the website to assist them with their application.

Of the 139 customers that reported changes to their circumstances online, 81% were provided with sufficient information on the website to report their change and 60% that used My Account to inform us of the change stated that they found it easy to use.

The overall results of the pilot indicated a 22% reduction in the volume of Contact Centre phone calls being presented and a 32% reduction in enquiries and appointments within the CSC as well as a 59% reduction in casual callers to the CSC.

Phone calls answered prior to the pilot (i.e. January to March 2017) totaled 12,429, averaging 191 per day. During the pilot (June to September 2017), calls answered totaled 5,429, averaging 136 calls per day. This represents a decrease in the average number of calls answered per day of 28.7%.

Average number of webchats presented during the pilot period generally increased week on week as more services became available for access through the “MyAccount” customer portal and Brent website.

Resident feedback was sought and obtained from across each communication channel from residents that experienced the changes concerned.

Overall findings from the pilot together with the resident feedback obtained indicate that the proposed changes have been positive although there are improvements that have been identified and will be further explored, as set out within the action plan. Volumes of complaints received per week have remained broadly similar throughout the pilot period, averaging approximately 3 per week in total for Benefits, Council Tax and the Customer Service Centre. This suggests that the changes made for the purposes of the pilot project have not had an adverse impact on service quality, as perceived by customers.

STAGE 3: ACTION PLANNING

8. What actions will you take to enhance the potential positive impacts that you have identified?

Replacing email enquiries with online forms has been very successful and consequently further means of developing and enhancing customer communication options and the portfolio of online forms will be explored and evaluated.

The current service facility that permits customers visiting the CSC to scan their Housing Benefit supporting information for attachment to their application will be further enhanced to enable them to link the documentation to their application without requiring staff assistance.

The current service that permits customers to upload their supporting documentation to support their Housing Benefit application will be further developed to simplify the process and enhance the customer experience.

Promote the service offer and options available for customers and in an accessible and inclusive way to ensure that customers across all protected characteristics are aware of the changes and can benefit from the enhanced offer.

Use feedback obtained from organisations that attend the Network Partnership Meetings and resident feedback to continuously improve and enhance the service available.

Retain existing service access and communication channels for vulnerable residents (e.g. phone and face to face).

We will monitor the impact of the proposals on a continuing basis on residents with protected characteristics as part of our service monitoring and improvement arrangements.

Investigate the findings obtained from resident feedback and use the opportunities that these present to further develop and enhance the service offer for customers.

9. What actions will you take to remove or reduce the potential negative impacts that you have identified?

We will continue to maintain and review our “vulnerable resident” guidance to ensure that it is representative, fit for purpose and that residents are not adversely impacted by the proposed

changes. We will monitor the impact of the proposals on residents with protected characteristics as part of service monitoring and improvement arrangements.

Customer Service staff have attended a range of training programmes to assist with the identification and provision of help for customers that may require support. This includes for example courses in relation to Mental Health Awareness and Disability Awareness. Courses / briefings have also been provided in relation to autism and personal safety. As further training needs are identified, appropriate training will be arranged and provided, as appropriate.

BCS also maintains a database of officers that can speak additional languages and who can be available to assist customers either visiting the offices or phoning.

10. Please explain how any remaining negative impacts can be justified?

There are no remaining negative impacts anticipated.