KENT COUNTY COUNCIL
EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)

This document is available in other formats, Please contact
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You need to start your Equality Analysis and data collection when you start to create or change any policy, procedure project or service

When developing high-level strategies under which other policies will sit, if those policies are jointly owned by KCC and partner organisations, they will need to take the partnership approach to EqIAs,

Please read the EqIA GUIDANCE and the EqIA flow chart available on KNet.

Directorate:
Strategic and Corporate Services – Engagement, Organisational Design and Development

Name of policy, procedure, project or service

Customer Service Policy

What is being assessed?

The Customer Service Policy which will define and agree the core customer service values and principles that it will require all commissioners and providers to uphold

Responsible Owner/ Senior Officer

David Cockburn
David Whittle/Jane Kendal

Date of Initial Screening

01/12/14

Date of Full EqIA :

2nd February 2015

March 2014

Version	Author	Date	Comment
0.1	PK	01/12/2014	First draft
0.2	PK	17/12/2014	Updated
0.3	JH	30/01/2015	E & D Team
0.4	PK	03/02/2015	Further development
0.5	PBC	09/02/2015	Further development
0.6	PK	10/02/2015	Minor amends (formatting/typos)
0.7	PBC	03/03/2015	Development following meeting with Equalities Team
0.8	PK	04/03/2015	Further reshaping
0.9	PK	05/03/2015	Finalisation
1.0	PK	10/03/2015	Final before consultation
1.1	PBC	01/06/2015	Updates following consultation
1.2	AA	08/07/2015	Suggested Amendments and Developments
1.3	PBC	09/07/2015	Updated EQiA
1.3	AA	24/07/2015	Further amends
1.4	PBC	27/07/2015	Updated EQiA

Characteristic	Could this policy, procedure, project or service, or any proposed changes to it, affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative	Internal action must be included in Action Plan	If yes you must provide detail
Age	Yes - Digital exclusion for some older and more vulnerable residents could accrue if service not designed inclusively.

There is also potential for increased isolation due to reduced face to face contact Age related disability and mobility prevent access. | Medium | Medium | Continue to build on programmes (for example within Libraries, Gateways and Children Centres) to promote digital inclusion. These have shown success in getting people online over the last 10 years. Ensure adequate alternative provision in place for those that cannot participate in digital service e.g. assisted service via Libraries.

User testing of new systems to be carried out prior to launch, using a cross section of customers with protected characteristics

Potential difficultly in contacting council by telephone to enquire or complete transactions. Other methods of communication to remain available to those who cannot contact the council by web | Increased accessibility of services for those that have access/can utilise technology

Potential for decreased social isolation for those that have access /can use technology

Remote self-service enabled for some services - mobility issues less problematic

By moving the majority onto digital this will reserve more traditional channels for those who can only access services through those channels

Clarity of expectation and experience – Standards developed in line with customer outcomes

More regularised reporting on customer experience will help identify any further actions required

By commissioning effectively, the |

					needs of all customer groups should be fully considered as part of the 'analysis' stage of commissioning any service The standards set out in the Policy requires commissioners to consider findings from their equality impact assessment in their service planning and to ensure the impact on all customer groups in relation to protected characteristics are considered in the design and ongoing delivery of each service.
Disability	Yes - Difficulties with reading, standard methods of communication or physical access and isolation can create barriers for this protected group of people.

People with sensory difficulties (for example deaf and/or blind) and complex communication needs will experience barriers accessing standard information and some digital services without us helping with assisted technology

The learning disabled may require additional assistance in order to utilise digital services effectively. Other access options will need to be made available to ensure | Medium | Medium | KCC developers and website owners have utilised assistive technologies such as NVDA software to check and improve the general accessibility of our website for blind and partially sighted customers. As a result screen readers have an improved experience of the site. IT colleagues are looking to introduce further assistive technology in a similar manner to widen accessibility.

Videos are provided with subtitles/transcribed or with audio file to assist those with sensory impairments.

'Browsealoud' (Software) can be downloaded (free of charge) used on our website for customers who have dyslexia, learning difficulties and visual impairments; this will read content on our website outline. Content is written to ensure that customers get the information they need without having to read reams of information. | Build upon assistive technology to improve service/web accessibility for this group

Web content accessibility improved by developing in line with the inclusive communication guide and the KCC style guide

Potential to assist in decreased social isolation

Mobility issues less problematic

By moving the majority onto digital this will reserve more traditional channels for those who need it

Clarity of expectation and experience – Standards developed in line with customer outcomes

More regularised reporting on |

	that customers are not excluded. Potential barriers in accessing services via phone Accessibility of buildings may prevent customers with particular disabilities from accessing services Risk that staff do not have the skills to address the requirements of various protected characteristic groups i.e. those living with dementia			We also provide easy read options on our website and when it is not practical to do we clearly indicate how a customer can obtain alternative formats i.e. large text. An easy read version of this policy was included as part of the consultation exercise. Ensure that our website works effectively on Smartphones to promote digital inclusion to customers who use these are their primary internet access User testing of new systems to be carried out prior to launch, using a cross section of customers with disabilities Ensure adequate alternative provision in place for those that cannot participate in digital service e.g. assisted service via Libraries. Risk that locations are not accessible to those with disabilities. Ensure that the KCC Asset Management Plan and commissioners service planning incorporates access considerations when considering a building as a location where face to face interaction with customers is intended. Potential difficultly in contacting council by telephone to enquire or complete transactions due to disability. For example Text Relay is used to enable hard of hearing and deaf customers to contact us or the ability to download Browsealoud to read content on our	customer experience will help identify any further actions required By commissioning effectively, the needs of all customer groups should be fully considered as part of the 'analysis' stage of commissioning any service. Following the standards set out in the Policy requires commissioners to consider findings from their equality impact assessment in their service planning and to ensure all customer groups are well reflected and involved in the design and ongoing delivery of each service.

| | | | | website.

A range of alternative contact channels (for example face to face provision where possible and telephone) will be made available to our customers to ensure that customers who require assistance in completing their enquiries or transactions are able to

Expansion of training already available within KCC to enable staff to ask the right questions and consider potential impact of changes on their customers. This training has included dementia awareness, customer feedback, consultation, general customer service and customer journey mapping. | |
|---|---|---|---|---|---|
| **Gender** | None Identified | Medium | Low | Consideration should be made to ensure that neither gender is affected by changes made | |
| **Gender identity** | None Identified | Medium | Low | Traditionally some transgender customers have be reluctant to approach services. Front line staff need to be aware and take into account their needs. | |
| **Race** | Yes - People who do not have English as a first language may experience barriers to accessing information, advice and services. Digital platforms not provided in users first language could provide difficulties and further assistance may be required | Medium | Medium | 'Browsealoud' (software) can be used on our website for customers whose second language is English; this will read content out loud in English.

All content is written in plain English

Alternative formats are offered to customers who require assistance including in alternative languages | Potential to assist in decreased social isolation

Clarity of expectation and experience – Standards developed in line with customer outcomes

By commissioning effectively, the needs of all customer groups should be fully considered as part of the |

	Potential difficulties in accessing information by phone due to language barrier			Potential difficultly in contacting council by telephone to enquire or complete transactions due to language barriers. Non English speakers can request translation services offered by the council	'analysis' stage of commissioning any service. Following the standards set out in the Policy requires commissioners to consider findings from their equality impact assessment in their service planning and to ensure all customer groups are well reflected and involved in the design and ongoing delivery of each service.
Religion or belief		Medium	Low	Offer access to information and advice in a variety of different ways and format. Understand the particular needs of different Religions and beliefs when redesigning and delivering services.	
Sexual orientation	None Identified	Low	Low	Staff will need to be aware of particular needs that might arise and be responsive to these requirements	
Pregnancy and maternity	None Identified	Low	Low		
Marriage and Civil Partnerships	None Identifies	Low	Low		
Carer's responsibilities	Yes - Carers will hold multiple protected characteristics so consideration will need to be given to diverse needs including age, cultural, language, sensory requirements etc.	Medium	Medium	As above	As above

Part 1: INITIAL SCREENING

Proportionality - Based on the answers in the above screening grid what weighting would you ascribe to this function – see Risk Matrix

Low	Medium	High
Low relevance or Insufficient information/evidence to make a judgement.	Medium relevance or Insufficient information/evidence to make a Judgement.	High relevance to equality, /likely to have adverse impact on protected groups

State rating & reasons

Medium Risk – A consultation has been carried out however the relatively small sample size of those who responded means it cannot be considered representative of those who will be affected by the policy. In addition whilst every effort has been made to consider the potential impact to those customers with protected characteristics, the current way in which data is held within the council means that there is insufficient evidence to suggest that all impacts have definitely been mitigated.

All changes that will be made as a result of the policy will therefore be required to complete a separate EQiA in which impacts to customers specific to that service are considered.

This EQiA will be regularly revisited and updated to reflect any evidence or actions that might need to be taken during its implementation to mitigate potential adverse impact to customers with protected characteristics.

Context

The downturn in the national economy and reduced public sector resources means that Kent County Council (KCC) wherever possible needs to deliver more for less. KCCs approach to service transformation and the move towards becoming a 'strategic commissioning authority' is outlined in the Councils transformation plan "Facing the Challenge: Delivering Better Outcomes".

It's important that we focus our activity and investment on delivering what is most important to our customers. We will focus on strategic outcomes as described in Kent County Council's Strategic Statement.

'Facing the Challenge' places a heavy importance on the role of the customer. KCC are going to improve how we use customer information and use customer insight and feedback to improve our services by focusing more on service user needs, and actively engaging customers in design and delivery of services.

As our organisation transforms and adapts to this approach, we will need to revisit the way in which we deliver services, placing the Customer at the heart of everything we do and ensuring every pound spent is delivering results and outcomes for people.

The generic term 'customer' is used throughout the Customer Service Policy, however the Policy also fully recognises that 'one size' does not fit all. KCC provides a wide range of services to its customers, varying enormously in nature and delivery imperative. Customers themselves of course vary in their requirements, preferences and personal barriers to accessing services. In taking forward this Customer Service Policy, KCC recognises its duties with regard to its diverse range of customers and in particular the requirements of equalities legislation and protected characteristics.

The Customer Service Policy has been informed by the following strategies and policies;

- Facing the Challenge – Delivering Better Outcomes 2013
- Outcomes Framework 2015
- Commissioning Framework 2015
- Complaints, Comments and Compliments Policy
- Inclusive communication guidelines 2015
- Information Governance policy 2013
- The National Digital Inclusion Charter

Aims and Objectives

The Customer Service Policy describes KCC's commitment to customers, and is described in three core principles which should be applied across the board when delivering services to customers. Service owners and commissioners must ensure that this policy and its principles are adopted throughout the supply chain. This Policy will be supported by the Commissioning Framework, allowing KCC to hold all service providers to account for ensuring our customers have a good customer experience.

The Customer Service Policy aims to provide this set of guiding principles for all services which must be applied to regardless of provider.

Principle 1: Delivering Quality

As KCC moves to become a strategic commissioner of services, there will many service providers. These Providers will be required to meet agreed levels of service across various channels with consistent quality and standards.

A set of minimum service standards will be developed for each service in line with customer needs.

Customer experience and how this will be monitored and reported must be part of all commissioning activity.

Commissioners will be required to prove that they meet the standards outlined in the customer service policy.

Principle 2: Customer Focused Services

KCC will ensure that its customers can access its services in the most flexible and convenient way so that good value for money is achieved for Kent's taxpayers. Services will be 'digital by design'

Service provision will be inclusive and responsive to customer need

Commissioners and providers will be expected to demonstrate how digital delivery is incorporated into service design, and how other channels will be used to support customers who cannot transact digitally.

Principle 3: Intelligent Commissioning

KCC will require all services to collect and feed-back a range of customer data and intelligence to inform it's commissioning and ensure that all services are aligned to customer needs.

We will develop a deep understanding of our customers, their needs and how and why they access our services

Commissioners and service providers will be required to collect a range of qualitative and quantitative information about our customers and use this intelligently to improve services

Customers must be involved in service design process. We will require all commissioners and providers to demonstrate how this is being achieved

Beneficiaries

The beneficiaries of the policy are intended to be the customers of Kent County Council, ensuring that they are receiving services that are suited to their needs and requirements. For all our customers we are intending to improve services delivery, ensuring that they are not excluded by whether they are able to transact online or not.

By improving our digital offer, we hope that customers who can will opt to use this method, reserving more traditional contact methods such as face to face or telephone for those who have more complex needs or for those who cannot transact online.

By having clear and defined principles we are setting out our expectations of all KCC services, whether they are delivered directly or by a commissioned service. This will allow KCC to hold all service providers to account for ensuring that customers have a good customer experience.

Information and Data

Following our consultation, we know that some of our customers will have barriers to using some of the channels that we will provide future services.

The consultation helped to understand which particular groups might have particular difficulties in accessing services digitally and this feedback is covered in the Involvement and Engagement section of this EQiA. This has helped us to inform this latest version of the EQiA and a rewrite of the policy.

However, relatively small sample size of those who responded means it cannot be considered representative of those who will be affected by the policy. In addition whilst every effort has been made to consider the potential impact to those customers with protected characteristics, the current way in which data is held within the council means that there is insufficient evidence to suggest that all impacts have definitely been mitigated.

Over the past three years, the Council has been involved in redesigning services from a customer perspective, using their feedback to understand how best to provide services and ensure that customers are not excluded due to their ability to transact online. The knowledge we have acquired through service changes, working alongside customers and examining customer needs, including understanding potential impacts to protected characteristics, have been used to inform the writing of this policy.

This policy is designed to improve services for all our customers or future customers. Services currently collect data about their customers which can be used to inform service design, however this data is not held centrally. Although we do not have all our customer data in one place, we do have some knowledge of the composition of Kent's population and have used this alongside our understanding of how people within the UK choose and need to access services.

As services look to redesign their offer, they will undertake an equality impact assessment to understand the potential impact of changes to their specific customer base.

With a resident population of just over 1.5 million, Kent has the largest population of all the English counties. The following information is understood from the 2011 Census and data produces from the Office for National Statistics in June 2015.

Age

- The mean age of the Kent population is 41. Kent has an ageing population with the number of 65+ year olds forecast to increase by 91,200 (31.8%) by 2026.
- Kent has a slightly smaller proportion of 0-4 year olds than the national average, but on the whole Kent has a younger age profile than the national average, with a greater proportion of young people aged 5-19 years than England.

Disability

There is no single measure available for disability. KCC uses a number of datasets to estimate the number of people that may have health issues or disability. This includes 2011 Census, Department of Work and Pensions benefits data, Annual Population Survey and Personal Independence Payment data,

- Using the broadest definition (2011 Census) 257,038 residents in Kent (17.6%) have a health problem or disability which limits their day-to-day activities.
- A higher proportion of people aged 65 and over (19.8%) claim disability benefits than those aged 16-64 (4.6%) or those aged 15 and under (4.0%)
- 7.4% of people in Kent were claiming a disability benefit as at November 2014, this equates to 110,470 claimants. This percentage is below the national average of 7.6%.
- 73.1% of claimants have a Physical Disability, 14.5% for a mental health problem and 11.4% claim for a Learning Difficulty.

Race

- 93.7% of all Kent residents are of White ethnic origin – this includes those who are White British, as well as other identities such as Irish, Eastern European origin etc. Kent also has Gypsy, Roma and Traveller populations greater than national average.
- 6.3% of Kent residents are classified as Black or Minority Ethnic (BME). This proportion is lower than the national average for England (14.6%), although has risen from the previous census and is anticipated to rise over time.
- 2.5% of households in Kent do not have anyone who speaks English as their main language living there.

Religion & Belief

- Almost three quarters of Kent residents follow a religion. 915,200 people are Christian which equates to 62.5% of the total population.
- The 2nd most popular religion in Kent is Muslim with 13,932 people which equates to 0.95% of the total population.

Gender

March 2014

- 51% of the total population of Kent is female and 49% are male

For more information on the social and demographic aspects of Kent's population can be found on the Kent.gov website

http://www.kent.gov.uk/about-the-council/strategies-and-policies/corporate-policies/equality-and-diversity

National reports, statistics and audits have helped us to understand how customers across the UK access the internet, for example the Office for National Statistics state that in 2013, 83% of UK households have access to the internet and 53% access the internet via their phones. 73% of adults used the internet every day.[1]

By offering services digitally, it will enable those who can use lower cost and low intervention channels to do so, whilst enabling the minority of customers who are unable to access services digitally and those who have more complex issues to gain extra assistance and guidance from KCC.

The actions in this policy are about recognising the barriers that have stopped people going online until now and introducing initiatives that will either make things better or provide alternative methods as appropriate. Being digitally capable can make a significant difference to individuals and organisation's day to day. Reducing digital exclusion can help address many wider equality, social, health and wellbeing issues such as isolation. 81% of people over 55 say being online makes them feel part of modern society and less lonely.

This data and information has helped us to formulate this policy and has been used to inform this EQiA.

Involvement and Engagement

The policy went to consultation for 12 weeks, during this time 88 individuals submitted questionnaire forms and five interactive workshops were carried out with forums across the county.

Workshops were undertaken with a BME (Black, Minority and Ethnic) community group, an older peoples forum and two groups of young people including a BME youth forum. A workshop was also held with a disability group – although this fell slightly outside of the consultation period comments have been included to ensure that their views are reflected.

Issues with regards to accessibility raised during the consultation include;

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[1] Office for National Statistics - http://www.ons.gov.uk/ons/rel/rdit2/internet-access---households-and-individuals/2013/stb-ia-2013.html

- The Learning Disability Forum wanted clear guidelines of what to expect, particularly with regards to how long it should take for someone to call or email them back. They also wanted to feel as if staff had taken the time to prepare for meetings with them in advance.

- The majority of the Learning Disability Forum did not use the internet or needed help to do so. They said that it would be easier to use the web if it was more pictures based and easier to use. Some also said they didn't really like to ask others to help them online as they prefer to be as independent as possible

- Young People in both forums expressed that they didn't know what services were on offer and didn't know how to find out about services.

- Getting satisfactory answers through first point resolution – seeing something tangible after feeding back such as "you said we did", we hate phases such as "we will feed that back" – which seems false and we never hear back.

- The Black, Minority and Ethnic Forum highlighted that flexibility is a key requirement, information is preferable in multiple formats, geography of Kent needs to be considered as this has can have a big impact on customer experience. Language – both plain English and lack of understanding of English is still an issue.

- The Older Persons Forum felt that older people in general do not use the internet – especially those in their later years, although it was accepted that some were comfortable doing certain things on computers

- More general feedback from the consultation focused on accessible language, that customers wanted to be involved in designing services and that we need to be careful not to exclude customers who cannot transact online.

Summary of Recommendations arising from customer feedback in the consultation

- We should actively consult and communicate with our customers throughout the implementation of the policy, so that they can see the impact of both their feedback and the implementation of the standards expressed in the policy

- We should remember to use plain English wherever possible. The language used in the Customer Service Policy should be reviewed to ensure they are as simple and clear as possible, and this approach should be taken forward into delivery.

- We should develop standards that can be monitored to ensure that there is a consistent approach to the Customer Service throughout the supply chain.

- The involvement of customers in service design should be strengthened in delivery planning for the Customer Service Policy.

- We will need to explore a variety of ways to ensure we capture and understand customer experiences in using our services

- Following the launch of the policy, the customer service standards for the council and delivery partners should be written in consultation with our customers.

- Need to ensure that 'Digital by Design' does not exclude those who do not use the internet

Potential Impact

It is envisaged that the following will benefit from the Customer Service Policy and its implementation: -

- All customers of KCC whether they are businesses, residents or visitors to Kent.
- Partners; public sector, private sector and voluntary organisations assisting and working together with joined-up service delivery centred around customer needs
- Staff and members.

KCC is committed to delivering the best possible services to all customers and service users. In line with our Public Sector Equality duties, we are committed to understanding and dealing appropriately with any barriers to service delivery associated with protected characteristics.

In general terms all customers are intended to benefit from the three principles outlined, however it is recognised that especially within principle two, where services will be 'digital by design' there will be a need to understand fully any barriers that this may create and ensure appropriate actions are taken to prevent creating or exacerbating disadvantage in this regard. The protected characteristics of Age, Disability and Race will require particular focus for each service when considering digital solutions. This will involve assessing the available contact options which can include mobile, web, social media, text messaging, web chat, applications (apps) and more traditional contact methods such as face to face and telephone.

KCC already has in place standards to ensure that the needs of protected characteristics are met. This includes the accessible communication

guidance, our website has been written to AA accessibility standard, the provision of text relay in our contact centre enabling the deaf and hard of hearing community to contact us and the ability to request documents in alternative formats.

As the policy is rolled out, KCC will establish a framework of standards as a benchmark. There will also be a design model to ensure that commissioned services are accessible to our customers regardless of who is delivering them on our behalf. KCC will ensure that no customer is left behind by the advancement of the digital agenda.

Each new project and/or service change that affects our customers will be consulted on to ensure that potential impacts on customers with protected characteristics are fully considered.

Key potential adverse impacts and benefits identified within each of the principles;

Principle One: Delivering Quality

Principle one will deliver clarity in terms of expectations of our service providers and commissioned services. Here we expect that minimum standards will be adhered to which will include demonstrating how services have been developed with their specific customer needs in mind.

This will include taking into account the needs of those customers with protected characteristics. Arguably this could potentially have a positive impact on those identified as the consistent approach to reporting and monitoring will also potentially highlight any further actions that may need to be taken to mitigate any adverse impact to those identified with protected characteristics.

Principle Two: Customer Focused Services

This principle focuses primarily on how services will be designed to suit the needs of our customers rather than our own historic understanding of their needs.

This includes the principle that services will be digital by design. This however, does not mean that customers who cannot access digital platform will be excluded from transacting with the council. This principle also highlights the importance of service providers to offer alternative means to those who cannot transact online.

This can include assistive technology, improved accessibility and offering alternative access channels for those who really need it. By offering digital solutions for the majority, it has the potential to improve service delivery by telephone and face to face, as it will release capacity to ensure that those with more complex needs and/or are unable to transact online are able to get help more effectively.

Principle Three: Intelligent Commissioning

To commissioning intelligently we will need to ensure that services have consistent standards when collecting and retaining customer data, so that we can understand who is using our services and design them appropriately for their needs. This will ensure that customers protected characteristics are considered in the design of our services regardless of who delivers them.

An increase in focus on outcomes will mean that we will hold commissioners to account, ensuring that customers are receiving services that are aligned to their needs.

Adverse Impact:

The consultation highlighted customer fears that they might be excluded if services were digital by design, particularly if they were older, had particular disabilities or did not speak English as a first language.

To mitigate these potential impacts the policy also requires service providers and commissioners to demonstrate how customers who cannot transact digitally will be supported.

The commissioning of services could result in reduced service provision or understanding of our customer needs; however the policy addresses this by compelling commissioned services to collect and feedback customer data as well as involving our customers in the design process for their service.

The action plan outlines some plans put in place to mitigate any potential adverse impact.

Positive Impact:

The policy focuses on designing services from the needs of our customers rather than our historic perception of what they might need. This will mean that customers will be given the opportunity to actively participate in the design of their services.

By focusing on digital by design, we are encouraging those customers who can to use cheaper and more efficient channels, this will free up capacity for those with more complex needs and who cannot transact online to access our services via more traditional routes.

JUDGEMENT

Option 1 – Screening Sufficient   **NO**

Justification:

March 2014

Option 2 – Internal Action Required   NO

Option 3 – Full Impact Assessment   YES

The consultation highlighted areas for concern from our customers with protected characteristics. KCC will need to work to ensure that these groups are not excluded when redesigning services or commissioning services to providers.

Action Plan

The action plan details how we will ensure that customers are not excluded by their ability to transact online.

Monitoring and Review

Following the sign off of the Policy, standards will be written to provide further clarity on how commissioned services and services owners within KCC will be expected to feedback.

The policy itself will be reviewed on an annual basis to ensure that its content is still relevant and that the aims of its principles are being applied across the council.

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed: Name:

Job Title: Date:

DMT Member

Signed: Name:

Job Title: Date:

March 2014

Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
All	Customers noted that the terms and the language used in the Policy needed to be easier to read and understand	Policy to be reworded	Easier to read and understand	Customer Relationship Team and Policy & Strategic Relationships	June/July	None
All	Customers want to be informed of changes made as a result of their feedback and of the policy	Communications plan to be devised and continually updated	Customers will be informed of how their feedback has made a difference to service delivery	Customer Relationship Team	September and ongoing	None
All	No defined Digital Strategy for KCC	Strategy to be written to inform KCC's Digital ambitions	Strategy written which takes into account the needs of each of the identified protected characteristics	Customer Relationship Team/Digital Services		None
Race	Potential language	'Browsealoud' (software)	Customers will	Digital		None

	barrier for those whose second language is English	can be used on our website for customers whose second language is English; this will read content out loud. All content is written in plain English	be able to access services	Services		
Age, Disability, Race, Carer	Digital channels not accessible to all members of society especially age, disability.	Continue to build on programmes promoting digital inclusion - these have shown success in getting people online over the last 10 years. Broadband infrastructure roll-out across the county Ensure that alternative channels are available where necessary Assessment of alternative channels for those that require them. Test website and content using assisted technology to understand whether it	Making digital channels more accessible where possible Ensure better understanding of potential barriers Ensure understanding of appropriate alternative channels required Ensure cascade of information to commissioners and providers	Libraries, Registrations & Archives Economic & Regeneration. Customer Relationship Team/	Ongoing	Not yet known

		works for those customers who rely on this technology to access our services online User test website inviting those with protected characteristics to feedback their views and inform us of any barriers they encounter Explore alternative ways of offering translated content	for service specification proposals. Customers using assisted technology can use our website Ensure customer feedback informs design and access improvements	Digital Services Team/ ICT		
Age, Disability, Race, Carer	Potential unknown barriers found in the launch of new applications	Test applications and content using assisted technology to understand whether it works for those customers who rely on this technology to access our services online User test applications inviting those with protected characteristics to feedback their views and inform us of any barriers they encounter	Customers with assisted technology can use applications	Digital Services Team/ ICT	Ongoing	

Age, Disability, Race	Potential Difficulty in contacting council by phone	Other methods of communication to remain available to those who cannot contact the council by phone Assisted technology made available for those who would like to contact us by phone for example translation services or Text Relay for customers who are hard of hearing	Customers can access services in via a method they are most comfortable/able to	Service Owners	Ongoing	None
Disability	Risk that locations are not accessible to those with disabilities	Ensure that the KCC Asset Management Plan and commissioners service planning incorporates an assessment of access/egress when considering a building as a location where face to face interaction with customers is intended.	Customers can access services no matter where they are delivered	Property/ Commission ers	Ongoing	None
All	Develop better understanding of	Identify current state- including alignments with	Customer Service	Policy and Strategic	Ongoing	None

	customer service delivery across KCC, as a commissioning authority working in a complex multiple provider environment	the principles outlined within the Policy in order to prioritise actions required to deliver compliance.	Improvement programme plan

CS compliance – Self Assessment | Relationships / Customer Relationship Team/ Service Owners | | |
All	Lack of overarching Customer Service Standards and Performance measures	Development of KCC Customer Service Standards and Performance measures in consultation with our customers	Set of overarching standards that can be applied, measured and reported on across KCC and for its commissioned services.	Customer Relationship Team / CMT	Following launch of the Policy	None
All	Review all KCC policies to ensure alignment with customer service policy	Review policies to ensure alignment to customer service policy, including complaints/compliment and comments	Alignment of policies to Customer Service Policy	Policy and Strategic Relationships	Ongoing	None
All	No corporate overview of customers and	Introduction of KCC wide customer information capture system –	Ability to design services that are customer	Customer Relationship Team, and	Ongoing	Cost of implementation of a new

	how they access our services or achieve outcomes. Potential barrier to understanding impact to customers with protected characteristics	capturing real customer information. e.g. Customer Relationship Management System	centric. Will also help to identify customers with protected characteristics and therefore identify potential impact of proposed changes.	commission ers / service owners		Customer Relationship Management system
All	Expertise spread across the organisation, this includes front line staff, customer intelligence teams, customer feedback teams, customer service and the Social Innovation Lab for Kent Team (SILK)	Agree and establish a Design Authority. Establish a Customer Service Design Network to bring together skills to create customer centric service design	Expertise used to design services alongside customers	Customer Relationship Team	Ongoing	None
All	When service proposals (e.g. commissioning plans) are developed using the Commissioning	All commissioning plans will need to consider the equalities implications of the Customer Service elements that will be delivered.	Equality Impact Assessments completed for all commissioning proposals and commissioned	All commission ers	Ongoing	None

			services.			
	Framework approach, changes will have the potential to have an impact on individuals within the population who have a protected characteristic.	Create a commissioners guide to the policy/standards and expectations.	Monitoring put in place.			
All	As services are changed in line with the policy, consultation will need to take place to assess the potential impact on individuals within the population who have a protected characteristic	All projects will need to investigate potential impacts, evidence and mitigate these where possible	Equality Impact Assessments completed for all proposals	Commissioners / Service owners	Ongoing	None
All	Training for staff prior to making changes to services.	Expansion of training already available within KCC to enable staff to ask the right questions and consider potential impact of changes on	Staff take into account potential impact to customers of any changes proposed	Service Owners	Ongoing	Cost of providing training

		their customers				