

# Somer Housing Group website – equality impact assessment

## Stage 1 Relevance test

Equality strand	Age	Disability	Gender/transgender	Race	Religion/belief	Sexual orientation	Socio-economic status	People with caring responsibilities	People living in rural communities
1. Is the website likely to have an impact (positive or negative) on any equality strand?	YES	YES	NO	YES	NO	NO	YES	NO	NO
2. Can the website help the organisation deliver any of its equality duties?									
a. Eliminating discrimination	NO	NO	NO	NO	NO	NO	NO	NO	NO
b. Promoting equal opportunities	YES	YES	YES	YES	YES	YES	YES	YES	YES
c. Promoting good relations	YES	YES	YES	YES	YES	YES	YES	YES	YES
d. Preventing harassment	NO	NO	NO	NO	NO	NO	NO	NO	NO
e. Enabling cohesive and sustainable communities	YES	YES	YES	YES	YES	YES	YES	YES	YES

Priority level (see notes below):

High	Medium	Low
✓		

Please explain the basis for your decision on the priority level:

The scope of this equality assessment is to examine the website itself as a tool to provide information and access to our service. Consequently, we will consider the technical delivery of the website, its structural framework, the layout of content – how information is organised and presented, and what information is/could be provided that would help discharge our equality duty. However, we will not consider the actual content (wording) of the website.

We assess this 'medium relevance' as it affects three elements of the general equality duty. We note that the website has the potential to 'promote' and 'enable' the organisation to deliver its equality duties, but not to 'eliminate' or 'prevent'.

This equality impact assessment will be reviewed by the Equality and Diversity Service Delivery Group, which is made up of residents and staff.

## Notes

### Priority level: high relevance

Any likely adverse impact is identified and/or the policy or function is relevant to 4 or 5 elements of the general equality duty.

### Priority level: medium relevance

No likely adverse impact is identified but the policy or function is relevant to 3 elements of the general equality duty.

### Priority level: low relevance

No likely adverse impact is identified and the policy or function is relevant to 0, 1 or 2 elements of the general equality duty.

## Stage 2 Initial equality Impact Assessment

*\* Throughout the document the term 'policy' has been used to include service, function or strategy.*

NB Only fill in the sections that are relevant

Title of policy being assessed	Somer Housing Group website
Name of service	Communications
Name and role of officers completing the EIA	Bernard Allen, Communications Manager
Contact telephone number / email address	01225 366043, bernard_allen@somer.org.uk

<b>1. Identify the purpose and intended outcomes of the policy and how it is implemented</b>			
	<b>Key questions</b>	<b>Answers / Notes</b>	<b>Actions required</b>
1.1	Is this a new a new policy / service or a review of an existing one?	Review of an existing function.	
1.2	Who defines or defined the policy? (e.g. is it a national requirement?). How much room for review is there?	No legal or regulatory requirements, other than general equalities legislation. Opportunities to compare best practice with other websites and high-performing housing associations. There is plenty of scope for ongoing review.	
1.3	Briefly describe the: <ul style="list-style-type: none"> <li>• purpose;</li> <li>• steps taken to deliver the policy; and</li> <li>• intended outcomes.</li> </ul>	To provide information and access to services for residents, stakeholders and the public, in a cost-effective way. To meet regulatory expectations about how we deliver our service and the information we make available to residents and the public.  The website was reviewed and relaunched in January 2008. A new content management system was procured and the website was designed in consultation with residents, who also agreed and tested the structure and content. 'Phase 2' of the website was delivered in 2009, including some improvements in accessibility, such as the implementation of BrowseAloud (a text to speech tool that reads website text out loud), translation tool (Google	As and when housing associations are deemed 'public bodies' for the purposes of the Freedom of Information Act, the website will be a primary tool to deliver a publication scheme.  A report on potential developments for 'Phase 3' of the website is on the Communications Action Plan for Q3, which is also to investigate mobile phone options and potential integration with the new housing management system (a separate project being delivered in 2011).

		Translate) and e-based recruitment.  The outcome is that information is easy to access for customers, and there are opportunities to access our own and other agencies' services from the website.	
1.4	Identify any other policies of your organisation or the Group that the aims of this policy link to or conflict with	The website does not conflict with any other policies and provides a method to deliver or publicise aspects of all policies as necessary.	
1.5	What factors/forces could contribute/detract from the outcomes?	Lack of access to a computer or inability to use a computer, both denying the opportunity to use the website.	
1.6	Who is intended to benefit from the policy and in what way (consider all angles)?	The website is universal and intended to benefit all customers equally.	
1.7	Who are the main stakeholders in relation to the function/policy?	The website has been designed principally to provide access to services and information to residents. Other stakeholders are potential residents looking for a home, staff and potential staff, and partner agencies and other providers.	
1.8	Who implements the policy and who is responsible for the policy?	Somer Housing Group's Communications Manager.	

## 2. Consideration of available data, research and information

You can only ever demonstrate that you are delivering a fair and equal service if you have monitoring and other data to support your perceptions. Please consider the availability of the following as potential evidence:

- Demographic data and other statistics, including census findings.
- Recent research findings.
- Results from recent consultation or surveys.
- Equalities monitoring data.
- Information from relevant groups or agencies, for example trade unions and voluntary and community organisations.
- Analysis of records of enquiries about your service, or complaints or compliments about them.
- Recommendations of external inspections or audit reports.

	Key questions	Answers / Notes	Actions required
2.1	What do you already know about people who use and deliver the policy?	The delivery of the website is a service provided and managed by the Group-wide Communications Team. This approach ensures consistency across the website and a review/check of all website content before it is published.	
2.2	What quantitative data do you already have (e.g. census data, staff data, customer profile data etc.)?	<p>There are over 12,000 households across the Group, the three Group members are at different stages in their understanding of their customer profile (see Annex A).</p> <p>The Group's website received just under 7,000 visitors in July 2010:  Somers Homes: 813  Trust: 4,206  Shape: 285  Redland: 783</p>	<p>The customer satisfaction Status survey for the Trust and Redland has asked questions about internet access/use, and the results will be available in August 2010.</p> <p>The Trust is conducting its biggest customer profiling survey to date, with the results expected in autumn 2010. This, for the first time, will include a question on access to computers and the internet.</p> <p>There is also little understanding of</p>

		<p>E-recruitment was introduced on the website in January 2010. A comparison of recruitment in the six months prior to implementation and the first six months using the new system, showed no significant change in applications from BME or disabled applicants, despite a huge growth in people using the new system.</p> <table border="1" data-bbox="974 550 1491 758"> <thead> <tr> <th data-bbox="974 550 1232 598">July–Dec 2009</th> <th data-bbox="1232 550 1491 598">Jan–June 2010</th> </tr> </thead> <tbody> <tr> <td data-bbox="974 598 1232 638">Campaigns – 42</td> <td data-bbox="1232 598 1491 638">Campaigns – 43</td> </tr> <tr> <td data-bbox="974 638 1232 678">Applications – 447</td> <td data-bbox="1232 638 1491 678">Apps. – 1,117</td> </tr> <tr> <td data-bbox="974 678 1232 718">BME – 14%</td> <td data-bbox="1232 678 1491 718">BME – 13%</td> </tr> <tr> <td data-bbox="974 718 1232 758">Disability – 6%</td> <td data-bbox="1232 718 1491 758">Disability – 4%</td> </tr> </tbody> </table> <p>Group-wide, we have demand data for alternative formats and languages in 2009/10, as follows:</p> <p>Braille – 1  Audio tape – 9  Audio CD – 2  Large print – 70  Sign language – 3</p> <p>Bengali – 2  Polish – 5  Somali – 1  Farsi – 1  Italian – 1</p>	July–Dec 2009	Jan–June 2010	Campaigns – 42	Campaigns – 43	Applications – 447	Apps. – 1,117	BME – 14%	BME – 13%	Disability – 6%	Disability – 4%	<p>computer/internet access among our residents, and so we cannot make any correlations to our customer profile, to see which specific audiences access services through the website and how.</p> <p>There is a general feedback link for comments on the website, which received zero emails in the year ending June 2010. We will encourage more feedback by looking at introducing a feedback link on every page, and in future a way of voting on the usefulness of pages using a star-rating system. We will also consider an independent, online survey of visitors to the website.</p> <p>We will test website accessibility and content using our own, developing user groups, and use our links with external agencies and community groups to test the website in future.</p>
July–Dec 2009	Jan–June 2010												
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		(We have also been asked to provide publications in the following languages for community groups: Hindi, Punjabi, Urdu, Chinese, Cantonese)	
2.3	What qualitative data do you already have (e.g. results of customer satisfaction surveys, results of previous consultations, staff survey findings etc.)?	<p>When the website was relaunched in January 2008, the new structure and content was reviewed and tested by a panel of residents.</p> <p>Phase 2 of the website was delivered in 2009. Among the improvements was the implementation of BrowseAloud, software which reads web pages out loud. This was introduced after testing with residents. A translation tool (Google) was also added to the website.</p> <p>The Audit Commission short notice inspection of the Trust's Lettings and Gas Safety services in March 2010, also considered cross-cutting themes of access and customer care, and equality and diversity. They recommended some improvements which were made immediately – such as highlighting how customers can access translations and alternative formats – while other actions were included in the improvement plans to respond to their final recommendations. This includes conducting an EIA for the</p>	<p>The Trust section of the website will undergo a resident review in August 2010. This will involve a structured questionnaire and a small focus group looking at the structure and content.</p> <p>A package of developments for 'Phase 3' of the website will be developed this year, and will focus on customer-led, interactive improvements that allow greater and easier access to services. This phase may also link in any relevant functionality created by a new housing management system being procured at the moment.</p> <p>Further mystery shopping exercises are planned, and we are encouraging more of these to be scheduled to test access to services through the website.</p>

		<p>website.</p> <p>Mystery shopping is carried out on Trust and Redland services by a trained team of residents. The Somer Homes section of the website was mystery shopped in 2010 and some improvements to the layout of the site were made. None of the recommendations related specifically to equality and diversity.</p>	
2.4	What additional information is needed to check that all equality groups' needs are met? Do you need to collect more data or carry out initial consultation at this stage?	No further information is required at this stage, as this is a service already being delivered and open to ongoing improvement and development.	We are recommending that future customer profiling questionnaires take the opportunity to ask questions around access to computers and the internet, and that this information is analysed in light of the equality strands.
2.5	How are you going to go about getting the extra information that is required?	This equality impact assessment will be published and shared with the public and with staff.	The public will be invited to comment on the assessment and are already able to feed back generally on the website.

<p><b>3. Assessment of impact</b></p> <p>Based upon any data you have analysed, or the results of consultation or research, use the spaces below to list how the policy / function will or does actually work in practice for each equalities strand:</p> <ol style="list-style-type: none"> <li>1. Consider whether the policy meets any particular needs of each equality strand.</li> <li>2. Identify any differential impact (positive or negative) for each equality strand.</li> <li>3. Include any examples of how the policy or service helps to promote race, disability and gender equality.</li> </ol>			
		<b>Impact / potential impact (negative, positive or neutral)</b>	<b>Reasons</b>

3.1	Gender – identify the impact / potential impact of the policy on women, men and transgender people.	Neutral	
3.2	Disability – identify the impact / potential impact of the policy on disabled people (ensure consideration of a range of disabilities including visual and hearing impairments, mobility impairments, learning disability etc.). It is important to note that the DDA 2005 requires housing providers to make reasonable adjustments for disabled people to remove barriers to accessing services.	Positive	<p>The website can be viewed as text only, in high-contrast, and the text size can be changed on each page. The website is designed to meet W3C’s AAA standard – an internationally-recognised standard for web page accessibility. This in turn makes it easier for proprietary screen readers to navigate and read the pages, and means the site works well with BrowseAloud software.</p> <p>For those with learning or literacy difficulties, the website offers no information in Easy English, pictorial format or video at present. The Group does not produce information in such formats at present, but in future the website will be an ideal platform to deliver this content.</p> <p>It has been considered previously, whether the website should be edited and approved by an independent organisation, such as the Plain English Campaign. This has been discounted on grounds of value for money and the demand there would be to update content. While it will not meet Plain English Campaign standards, all information is reviewed and proofed by Communications before it is published. This may be an area to develop in the future.</p>
3.3	Age – identify the impact / potential impact of the policy on different age groups.	Negative	Computer use is undoubtedly lower among older people and delivering services through the website alone could potentially discriminate against some older customers. Therefore, we do not place over reliance on the website strategically, as a way of delivering services.

			The Trust and Redland (which both have high proportions of older customers) actively encourage silver surfing, with projects put in place at some of their sheltered housing schemes, where there was demand from residents for this.
3.4	Race – identify the impact / potential impact on different black and minority ethnic groups.	Positive	<p>The Google Translate tool is available from every page to mechanically translate the content into a different language with one click. If sufficient demand made it value for money, the organisation could look at providing and maintaining a fully-translated version of the website, although it would also need to consider providing its full range of publications in different languages too.</p> <p>BrowseAloud is also helpful for customers for whom English is not their first language, and includes a dictionary function with simple word definitions.</p>
3.5	Sexual orientation – identify the impact / potential impact of the policy on lesbians, gay men, bisexual and heterosexual people.	Neutral	
3.6	Religion/belief – identify the impact / potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Neutral	
3.7	Socio-economically disadvantaged – identify the impact / potential impact on people who are disadvantaged socio-economically (factors like family background, educational attainment, where you live, and the sort of job you have can influence your chances in life as well as things like gender, ethnic background, and whether or not you have a disability).	Negative	<p>We do not have data for how low incomes might affect access to computers or the internet. Regular computer users can still access the internet via schools, community centres, libraries and internet cafés. However, as the Group's members deal with some of the most disadvantaged in society, it is fair to presume that computer ownership may not be high.</p> <p>The Trust provides computer access to its website and selected partners at its main office and its four Local Service</p>

			Centres. Shape provides computer access for clients at many of its projects. Redland has no provision itself and refers residents to the Bristol Tenants Resource Centre.
3.8	People with caring responsibilities – identify the impact / potential impact on people with caring responsibilities (e.g. families with dependent children / caring for older relatives).	Neutral	
3.9	Rural communities – identify the impact / potential impact on people living in rural communities.	Neutral	We do not have data for Broadband access in rural areas, but it is possible that some areas are poorly served. However, we do not judge that this would have a negative impact, as it would not deny access to our services, and there isn't currently any high-bandwidth content on our website that would require a fast Broadband connection.
3.10	Does the website reflect a diverse audience	Positive	The website is representative of our customer base and includes positive images of a diverse range of people. This needs to be checked against emerging customer profiling data.

If adverse differential impact has been highlighted by the process, or if the policy / function is directly / indirectly discriminatory, proceed to stage 3 – none found, so not proceeding to stage 3.

## Equality impact assessment improvement plan

Please list the actions that you plan to take as a result of this assessment. These actions need to be built into the service planning framework and targets should be measurable, achievable, realistic and time bound.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Delivery of further accessibility enhancements	Research for phase 3 development of the website.	Report to Group Executive (senior management team).	Communications Manager	End of 2011
	Review and improve the website in line with emerging customer profiling data.	STATUS survey data for Redland and the Trust.	Communications Manager	August 2010
		Trust customer profiling data.	Communications Manager	End of 2010
	Keep position on editing/accreditation of part/whole website by independent organisations such as the Plain English Campaign under review.	Review in 2011.	Communications Manager	End of 2011
Improve feedback mechanisms	Add ability to feed back from all pages.	Link available on all website pages.	Communications Manager	August 2010
	Consider customer star rating of pages.	Review in 2011.	Communications Manager	End of 2011
	Consider independent website visitors' survey.	Review in 2011.	Communications Manager	End of 2011
Consult users more widely	Consider how to reach minority audiences for feedback on the website, using Trust user groups	Trust resident-led review of website layout and content.	Communications Manager	August 2010

	being set up, mystery shoppers, and links with external agencies and community groups.			
Improve range of information available for customers with diverse needs	Publish information in more accessible formats, such as video clips, Easy English and pictograms.	Review in 2011.	Group members	End of 2011
	Ensure pictures on website remain representative of our customers and provide positive images.	STATUS survey data for Redland and the Trust. Trust customer profiling data.	Communications Manager Communications Manager	August 2010 End of 2010
Improve access for customers to the website	Promote the website and provide more access points and projects.	No projects currently planned.	Group members	–

## Annex A – Customer profile data

	Trust – Sheltered (approx. 20%)	Trust – Other (approx. 80%)	Redland	Shape – Young Persons	Shape – Temp. Acc.
	April 2010	Unknown	June 2010 (by tenant)	2009/10	2009/10
<b>Gender</b>	63% Female 37% Male		63% Female 37% Male	52% Female 48% Male	53% Male 47% Female
<b>Disability</b>	(July 2009) 7% Dementia 6% Sight impaired 45% Mobility issues 20% Hearing impaired 12% Mental ill health 10% Housebound	75 Partially sighted 10 Mental ill health 3 Blind 3 Physically disabled 2 Deaf	20% (of known data) 31% Not known	46% Did not answer 44% None 4% Learning difficulties 3% Behaviour difficulties 2% Mental ill health 1% Dyspraxia 0% Physical/sensory	32% None 26% Mental ill health 25% Did not answer 9% Learning difficulties 6% Physical/sensory 2% Behaviour diff.

<b>Age</b>	2% Under 50 4% 50–59 39% 60–74 35% 75–84 20% 85+		2% 0–20 33% 21–40 35% 41–60 24% 61–80 6% 81+	Service is for 16–25 year olds	24% 16–18 20% 19–21 20% 22–29 17% 30–39 9% 40–49 8% 50–59 2% 60+
<b>Race</b>	84% White British 2% White other 2% Did not disclose 1% White Irish 6 Black Caribbean 4 Mixed other 3 Black/British Carib. 2 Black/British African 2 Black/British other 2 Asian/British Indian 2 Asian/British other 1 White African 1 Black African 1 Chinese / Ch. other	4,142 White British 215 White other 78 Did not disclose 33 Mixed other 32 Black Caribbean 32 Black other 25 White Irish 16 White/Black Carib. 13 Asian other 9 Black African 8 Other ethnic group 7 Black British 3 White Asian 3 Bangladeshi 2 Chinese 2 Indian 1 White/Black African	81% White British 11% Other 8% Not known/refused	87% White British 7% Mixed Race 3% Black Caribbean 2% Chinese 1% Greek	84% White British 5% Did not answer 2% White/Black Carib. 1% White Irish/British 1% White/Black British 1% White/Black African 1% White S. American 1% White S. African 1% Filipino 1% Maltese 1% Traveller 1% Mixed other
<b>Sexual orientation</b>	67% Not disclosed 33% Heterosexual 1 Homosexual			94% Heterosexual 3% Bisexual 2% Gay 1% Did not want to comment	86% Heterosexual 7% Did not answer 5% Gay 2% Bisexual
<b>Religion/belief</b>	89% Christian			41% Not applicable	83% None

	10% Other 3 Muslim 2 Buddhist 1 Hindu 1 Jewish			17% Open-minded 17% None 11% Christian 4% Refused to answer 1% Pagan 1% Not sure 1% Not known 1% Atheist 1% Agnostic	8% Did not answer 5% Christian 1% Jewish 1% Wiccan 1% Rastafarian 1% Unitarian
<b>Socio-economic data</b>		541 Single parents 527 Widowed	13% Households with a vulnerable member		
<b>Caring responsibilities</b>	5%				
<b>Rural communities</b>	35%				