

Surrey County Council Equality Impact Assessment Template

1. Context of the Service or Policy

Service or Policy being assessed: Online E-Recruiting function

Assessor: Roger Clifton (EEE Solutions Ltd) **Date:** 14 November 2008

What are the aims of the service or policy? If this assessment is part of a project it is important to focus on the service or policy the project aims to review/improve (NB this should set out the aims and objectives of the policy or service)

This E-Recruiting function is part of Hire to Retire, which itself is part of the Corporate Services Process Improvement Programme, an element of the overall Transformation Programme. This replaces the present online recruitment function and is part of the SAP application. The aim of the E-Recruiting function being assessed is to provide an online mechanism to search and apply for jobs within the Council.

To put this Equality Impact assessment in context, it needs to be made clear that, as well as reviewing the proposals for the online application (contained within the Blueprint Document), it also makes recommendations about the alternative methods of applying for jobs (known as mediated access) with the Council, which will be created during the next few months (as part of the realisation process), alongside the development of the online function.

Who are the beneficiaries /users of this service or policy?

(NB this should address needs of client groups and a review of barriers to policy or services)

Anyone searching for, or actually applying for, a job with Surrey County Council and is therefore part of the recruitment process. This assessment considers the potential barriers faced by different sectors of society and makes recommendations about overcoming these. As well as the 6 strands listed below: age, belief/faith, disability, Gender/transgender, sexual orientation and race, effects of low income are considered and general recommendations are made within the "HR issues only" section.

What is the existing situation in relation to minority, disadvantaged and excluded groups in which this service/policy operates? (including age, belief/faith, disability, Gender/transgender, sexual orientation, race and other general equality strands or issues that might make people vulnerable. NB this will require declaring what information is currently captured with respect to equality & diversity Monitoring) of this service or policy. It is also important to show the relevance of capturing this data.)

At the time of carrying out this assessment, the mediated access option to apply for jobs has not been developed, so it is not possible to comment on these. However, these should be equality impact assessed in their own right and care must be taken when developing them not to create differences with the online recruitment rules, thus creating advantage/disadvantage depending on which application method is used.

Senior management have agreed to go ahead with the online E-Recruiting function, despite the fact that there are accessibility issues, more details about these will follow

under the relevant strands. Although this is clearly necessary from a timing and/or financial viewpoint, it is not justifiable from an equality and diversity perspective. The fact that alternative options are being put in-place, significantly reduces the likelihood of a successful legal challenge, since this would probably be viewed as a “reasonable adjustment”. However, alongside this, it is strongly recommended that accessibility issues are resolved. Arguably, the situation created once the new function is implemented is contrary to the HR Equality and Diversity statement in that it isn’t: “Developing and promoting employment policies that allow for equal access to employment and training“. Additionally, HR needs to be seen as a model of good practice to ensure that: “awareness of HR's responsibility for Diversity remains a priority across the council.

In general terms, Surrey has taken a number of steps to overcome inaccessibility, for example translating material into other languages and offering assistance in completing forms for people who have difficulty in doing this, which does indicate a general practical acceptance of the importance of resolving these issues.

Equality and diversity data is collected for monitoring purposes during the application process. This covers all strands. It is suggested that, when implemented, this is used to establish whether the different application methods are favoured by particular sectors of society. As well as simply being gathered, it is important that the data is used effectively, not only to meet statutory requirements, but also to identify strengths and weaknesses with the whole recruitment process for specific sectors of society. For example, if it becomes clear that people with disabilities are applying, but not reaching the interview stage, it may indicate that there is a barrier with the application process that is preventing this. This report has been specified within the Blueprint and should remain within scope.

There are a range of other reports specified in the Blueprint and there should be the capability, if required, to break these down by equality strand. An immediate example of where this might be useful is the report showing applicants by media source, as this may identify strand differences.

Finally, it is important that all Equality and diversity related reports can combine data captured from the online function with that captured through the alternative application process. This will cover people that could use the online function, but have chosen the alternative method, as well as other categories, such as Variant B, who will use the mediated access option.

2. Given what you already know, what is the potential for this service/policy to have a negative or differential impact on minority, disadvantaged, vulnerable and excluded groups or on race relations and community cohesion?

Please summarise the negative impact identified due to age, belief/faith, disability, Gender/transgender, sexual orientation, race and other or general equality issues

Age:

- It is less likely that older people will make use of the online function either to search for vacancies or to apply for them and therefore the benefit of the new function will be less for this group.
- It is believed, although there is no tangible evidence, that older people are less likely to feel comfortable in providing sexual orientation information and therefore, if

they have to do this verbally or in a way that they feel is not confidential, it may deter them from applying.

- Young people in particular may wish to access this information using mobile devices. Functions that have accessibility issues are harder to use from mobile devices and this may cause a negative reaction from those wishing to do so.

Belief Faith

- There is still concern amongst a number of people about providing belief/faith information. If there is not a “do not wish to disclose” option, then some may simply not apply and others may provide false information which, if they were successful with their application and this subsequently came to light, could be regarded as a disciplinary matter
- Some concern has been raised about the ability of the SAP system to store belief/faith information, which may cause issues in entering or reporting on this data.

Disability

- This group, if any, is the one most affected by the inaccessibility of the new E-Recruiting function and this could lead to less applications from this sector of society.
- It is imperative that the alternative method(s) of applying are fully accessible to all disabled people, whose requirements themselves are diverse due to the variety of impairments. If this is not done, then applying for a post with the Council may prove too difficult for some and may possibly lead some to believe that “reasonable adjustments” have not been made.
- Applicants are not asked to specify their preferred format for communication. If this is not asked and provided, it may cause difficulty for some people and deter them from applying.
- There is a potential future development to adopt the Equality and Human Rights Commission recommendations and not only ask for a yes/no/don't know response to the question on disability, but to break this down further into different impairment categories if the answer is “yes”. If this is done, people must be able to select more than one impairment to cater for multi-disability and ensure the results are as accurate as possible.

Gender

- Although there are a number of areas throughout the recruitment process where gender negative impact could occur, none of these can be directly attributed to the new online E-Recruiting process and care must be taken to avoid this when designing alternative application methods.

Sexual Orientation

- There is still concern amongst a number of people about providing sexual orientation information. If there is not a “do not wish to disclose” option, then some may simply not apply and others may provide false information which, if they were successful with their application and this subsequently came to light, could be regarded as a disciplinary matter
- Some concern has been raised about the ability of the SAP system to store sexual orientation information, which may cause issues in entering or reporting on this data.

Race

- There needs to be an awareness that people for whom English is not their first language may have difficulty understanding more complex information and therefore authors should ensure that “plain English” is used in SAP and alternative application methods. Difficulty in understanding the language used could prevent some people from submitting applications.
- Applicants are not asked to specify their preferred language for communication. If this is not asked and provided, it may cause difficulty for some people and deter them from applying.
- SAP, and the alternative method of applying, needs to be able to cater for amending the range of ethnic origins offered. This is likely to change in the 2011 Census and, if these changes are not reflected in the data capture and reporting processes, it will be difficult to compare results against local/national statistics.
- The alternative application process used will need to be aware of the cultural sensitivities that can exist when asking for information of a personal nature. Failure to be aware of these could offend the potential applicant.

People on low incomes

- Although this is not a sector of society often considered in their own right, creating, and hoping the majority of people will use, an online system does have an effect on people on low incomes.
- People on low incomes may not have their own access to the Internet and, although libraries and other venues can provide this facility, it is unlikely that many individuals will make use of these when applying for jobs. There should be realistic expectations about the use of the new E-Recruiting system for certain positions, otherwise there may be lower than anticipated application rates.

HR issues only:

- This section is being used to raise potential negative impact across the board, rather than primarily for a specific strand.
- The SAP system must be able to meet minimum legal requirements in terms of the data capture and reporting of Equality and diversity information. Given these are legal requirements, this is mandatory, even if it requires some customisation, If the SAP system really cannot be amended to cater for these, alternative solutions must be found.
- It has been mentioned above that the mediated access method of applying must be equality impact assessed in its own right at all appropriate stages. This should be incorporated from the beginning of the development process and include consultation with all sectors of society. This will increase the chances of removing all barriers for all sectors of society.
- Those involved in delivering the mediated access option should receive all necessary training required by those dealing with the general public and should be thought of in the same way as Contact Centre staff. If this is not done, applicants may be unintentionally offended by actions, language etc of Council staff, which in itself would create a barrier to applying.

3. Given what you already know, what is the potential for this service/policy to have a positive impact, such as tackling discrimination, promoting equality of opportunity and / or promoting good community relations, for minority, disadvantaged and excluded groups?

Please summarise the positive impact identified due to age, belief/faith, disability, Gender/transgender, sexual orientation, race and other or general equality issues. NB this would include positive initiatives delivery by the service or through the policy for any/all of these equality groups. What have been the outcomes or changes?

Age

- Having an online job application function should ensure that more younger people are encouraged to apply.

Belief / Faith

- As long as there is sufficient explanation about how it will be used, providing belief/faith information electronically, and therefore does not need to be seen by people, should encourage anyone who may fear discrimination, or be uncomfortable supplying such data, to apply.

Disability

- An easy to access online function would be very positive for a large number of disabled people that have difficulty in processing printed material.
- Having a fully accessible alternative method of applying will encourage disabled people unable to access the online function.

Gender

- There is no obvious positive impact for people of a particular gender.

Sexual Orientation

- As long as there is sufficient explanation about how it will be used, providing sexual orientation information electronically, and therefore does not need to be seen by people, should encourage anyone who may fear discrimination, or be uncomfortable supplying such data, to apply.

Race

- There is no obvious positive impact for people of any particular ethnic origins in using the online function.
- Using the mediated access option should be a positive experience for people from all cultural backgrounds As long as those involved in delivering the option are well trained and informed.

People on low incomes

- If a person on a low income can access the online function, it maybe that they will be able to apply for jobs without incurring any cost.

HR issues only:

- If SAP can provide all required equality and diversity reports, then the amount of recruitment information will be increased, thus giving a better understanding of the current situation and the issues that cause this.

4. Give details of involvement, consultation and or research undertaken for each relevant equality and diversity grouping, upon which this policy/service has had an impact either internally or externally.

What is the research telling you in relation to age, belief/faith, disability, race gender/transgender, sexual orientation and other equality issues?

There are no specific groups that have been created to carry out such consultation on the Council's behalf and it was not within the remit of this assessment to create these. However, as mentioned later in this assessment, such groups would provide a vital source of information and it is suggested that work begins as soon as possible to create them. They could, for example, then contribute towards the design of the mediated access option.

As well as interviewing a wide variety of staff, the assessor has used their own experience and networks to identify the information contained within the impacts and recommendations within this report. Networks used are not local to Surrey, which is not ideal, but they are associated with each strand and, since anyone could be applying for a job, are therefore relevant to this assessment.

Specifically with regard to accessibility of the SAP system, feedback from Kent Police and Manchester City Council has been viewed to gain an understanding of the issues encountered by those organisations.

5. Given your answers to the previous questions, how will your service or policy be revised to mitigate, reduce or eliminate negative impacts and enhance positive impacts for the relevant equality groups?

(NB this is in effect the Recommendations to improve this policy)

Recommendations have been broken into the following 5 high-level headings, with each containing a number of actions that need to be addressed:

- Improve initial SAP implementation
- Ensure mediated access solution is effective
- Address online function accessibility issues
- Make longer-term improvements to the online E-Recruiting function
- Create consultation groups for future equality impact assessments.

Improve initial SAP implementation:

- Ensure the data capture, storage and reporting elements of the SAP system can cater for minimum equality and diversity legal requirements.
- Ensure that sexual orientation and belief/faith questions on the equality and diversity monitoring form have "do not wish to disclose", or similar wording, options. This is not a legal requirement, but is suggested best practice.
- Confirm that SAP can store sexual orientation and belief/faith data in a way that meets the requirements of data entry and reporting.
- Ensure that equality and diversity reports can be produced at all required stages of the recruitment process.
- Produce a report, broken down by strand, showing numbers using the function and compare these at strand level to the mediated access alternative.
- Create the ability to combine data from the online E-Recruiting data with mediated access information, so that overall recruitment reports are available.
- Allow other specified reports to be broken down by equality strand when required, for example, media source.
- Produce text in easy to understand "plain English".

Ensure mediated access solution is effective:

- Carry out equality impact assessments on all functions.
- Commence equality impact assessments as part of function design/development.
- Consult with groups/individuals representing each strand to increase the likelihood of an effective solution being implemented.
- Provide necessary training to those dealing with the general public so that they are: aware of cultural/strand specific differences, have an appreciation of up-to-date terminology to use, understand how to avoid unintentional discrimination, etc.
- Ensure mediated access uses same business rules as online E-Recruiting function, thus creating no advantage/disadvantage for users of either system.
- Ensure that sexual orientation and belief/faith questions on the equality and diversity monitoring form have “do not wish to disclose”, or similar wording, options. This is not a legal requirement, but is suggested best practice.
- Ensure that equality and diversity reports can be produced at all required stages of the recruitment process.
- Produce a report, broken down by strand, showing numbers using mediated access and compare these at strand level to the online E-Recruiting function.
- Create the ability to combine data from the mediated access data with online E-Recruitment information, so that overall recruitment reports are available.
- Allow other specified reports to be broken down by equality strand when required, for example, media source.
- Produce text and communicate verbally using easy to understand “plain English”.

Address online function accessibility issues:

- Review existing accessibility issues so that these are fully understood and solutions can be proposed.
- Consider obtaining assistance from accessibility experts to ensure list is complete and full range of solutions are investigated.
- Consider strengthening links with other users of the SAP E-Recruiting function to gain from their experience and see whether a solution would benefit more than just Surrey County Council.
- Investigate any possibility of such accessibility requirements being included as part of the SAP “off the shelf” solution.
- Based on the above, create a road map that concludes with the implementation of changes to ensure the accessibility issues are resolved.

Make longer-term improvements to the online E-Recruiting function:

- Using monitoring data, identify sectors of society that are underrepresented in their usage of the function, use a variety of consultation mechanisms to establish why and consider amendments to address the issues.
- Ask applicants to specify their preferred format for communication and be able to provide this.
- Ask applicants to specify their preferred language for communication and be able to provide this.
- If disability is broken down into impairment categories, ensure that system allows the applicant to select more than one category to cater for multi-disability.
- Ensure the online system can cater for amending the range of ethnic origins offered.

Create consultation groups for future equality impact assessments:

- Make contact with a range of groups and individuals representing each equality strand.
- From these contacts, form a consultation group for each strand and consider whether a cross strand group would also benefit the consultation process.
- Agree terms of reference and operating procedures for these groups.
- Start consulting with the groups.

6. Actions needed to implement the EIA recommendations:

Action Plan

Issue	Action	Expected outcome	Who	Deadline for action
Improve initial SAP implementation	Ensure SAP meets minimum E&D legal reqs	Documented confirmation obtained	E-Recruitment Project Sponsor	Nov 08
Improve initial SAP implementation	Include “do not wish to disclose” wording for sexual orientation and belief/faith on E&D monitoring form	Form amended	E-Recruitment Project Sponsor	Nov 08
Improve initial SAP implementation	Confirm that storage of sexual orientation and belief data in SAP is acceptable	Documented confirmation obtained	E-Recruitment Project Sponsor	Nov 08
Improve initial SAP implementation	Ensure required E&D reports can be produced at all stages	Report specified and included in design	E-Recruitment Project Sponsor	Dec 08
Improve initial SAP implementation	Produce report showing numbers using function and compared with mediated access option	Report specified and included in design	E-Recruitment Project Sponsor	Dec 08
Improve initial SAP implementation	Ensure data can be combined with mediated access information for reports	Report specified and included in design	E-Recruitment Project Sponsor	Dec 08
Improve initial SAP implementation	Ensure other reports can be broken down by strand	Documented confirmation obtained, with required reports specified and included in design	E-Recruitment Project Sponsor	Dec 08

Improve initial SAP implementation	Write text in "plain English"	Ad-hoc checks on text provided	E-Recruitment Project Sponsor	Ongoing
Ensure mediated access solution is effective	Carry out EIAs	Documented EIAs	E-Recruitment Project Sponsor	Mar 09
Ensure mediated access solution is effective	Consult with groups/individuals	Documented evidence of consultation	E-Recruitment Project Sponsor	Mar 09
Ensure mediated access solution is effective	Provide required training	Training needs analysed and programme delivered	E-Recruitment Project Sponsor	Mar 09
Ensure mediated access solution is effective	Create business rules to match those applying to online function	Documented agreement in principle that there will be no differences	E-Recruitment Project Sponsor	Nov 08
Ensure mediated access solution is effective	Include "do not wish to disclose" wording for sexual orientation and belief/faith on E&D monitoring form	Form amended	E-Recruitment Project Sponsor	Nov 08
Ensure mediated access solution is effective	Ensure required E&D reports can be produced at all stages	Report specified and included in design	E-Recruitment Project Sponsor	Feb 09
Ensure mediated access solution is effective	Produce report showing numbers using mediated access and compared with E-Recruitment option	Report specified and included in design	E-Recruitment Project Sponsor	Feb 09
Ensure mediated access solution is effective	Ensure data can be combined with E-Recruitment information for reports	Report specified and included in design	E-Recruitment Project Sponsor	Feb 09

Ensure mediated access solution is effective	Ensure other reports can be broken down by strand	Documented confirmation obtained, with required reports specified and included in design	E-Recruitment Project Sponsor	Feb 09
Ensure mediated access solution is effective	Write text in "plain English"	Ad-hoc checks on text provided and staff communications	E-Recruitment Project Sponsor	Ongoing
Address online function accessibility issues	Review accessibility issues and propose solutions	Issues clearly understood and documented and proposal submitted to senior management	E-Recruitment Project Sponsor	Feb 09
Address online function accessibility issues	Consider using accessibility experts to help understand issues and develop solutions	Documented evidence for using, or not, experts	E-Recruitment Project Sponsor	Dec 08
Address online function accessibility issues	Strengthen links with other SAP E-Recruitment users	Ongoing partnerships formed, or reasons why these are not required documented	E-Recruitment Project Sponsor	Jan 09
Address online function accessibility issues	Establish whether proposed changes can be included in "off the shelf" package	Documented evidence of communications with SAP supplier	E-Recruitment Project Sponsor	Feb 09
Address online function accessibility issues	Create road map concluding in implementation	Road map to be part of proposed solution mentioned above and system changes made	E-Recruitment Project Sponsor	Oct 09
Make longer-term improvements to the online E-Recruiting function	Amend system to cater for low usage by certain groups	Documented evidence of low usage, consultation with those groups and system changes made	E-Recruitment Project Sponsor	Ongoing

Make longer-term improvements to the online E-Recruiting function	Obtain and provide applicant preferred format	System amended	E-Recruitment Project Sponsor	Oct 09
Make longer-term improvements to the online E-Recruiting function	Obtain and provide applicant preferred language	System amended and service in-place	E-Recruitment Project Sponsor	Oct 09
Make longer-term improvements to the online E-Recruiting function	Include question allowing for multi-disability to be indicated	Requirement specified and system amended	E-Recruitment Project Sponsor	Whenever decision made to include this
Make longer-term improvements to the online E-Recruiting function	Ensure system can cater for more ethnic origin categories	System amended	E-Recruitment Project Sponsor	Oct 09
Create consultation groups for future equality impact assessments	Make contact for each equality strand	Contact made and documented	Equality and Diversity Manager	Jan 09

Create consultation groups for future equality impact assessments	Create groups	Groups formed and first formal communication made	Equality and Diversity Manager	Feb 09
Create consultation groups for future equality impact assessments	Agree TOR and operating procedures for groups	TOR and procedures agreed and documented	Equality and Diversity Manager	Mar 09
Create consultation groups for future equality impact assessments	Start consulting with the groups	Documented evidence of consultations and how this has an effect on EIAs	Equality and Diversity Manager	Ongoing

NB these actions should have SMART Targets

NB these actions should be reported to the Departmental Equality and Diversity Implementation Group (DIG) and incorporated into the Equality and Diversity Action Plan, Service Plans and/or personal objectives of key staff.

7. **If no actions are to be taken with respect to the recommendations please give reasons below:**

Action plan review date: Not applicable due to suitability of the function being assessed

Name of person responsible for review: If review does take place, this will be the E-Recruitment Project Sponsor

Name of person who carried out assessment: Roger Clifton (EEE Solutions Ltd)

Name Head of Service: Carmel Millar Signed: _____

Date Completed: _____

1. Signed off electronic version to be kept in your team for monitoring and audit purposes
2. Send an electronic copy to the SCC 'Web Operations Team' for publication on the SCC website
3. Send Action Plan to DIG for review at its next meeting.

Date sent to Web Operations Team: _____