

## EQUALITY IMPACT ASSESSMENT FORM

Not all projects require a full impact assessment. Please ensure you have completed the pre-appraisal checklist (Link) which defines this requirement.

<b>Name of Business Unit</b>	Flood Unit
<b>Name/designation of person(s) responsible for managing/ conducting this process</b>	Stewart Prodger / Pascal Lardet

<b>Name of Policy / Function / <u>Service</u> / Strategy / Action Plan / Programme / Project etc.</b>	Floodline service	
<b>Is it (*delete as applicable)</b>		Existing
<b>Is the service contracted out or delivered under a service-level agreement? (*delete as applicable)</b>		Several in place, this is jointly run by SEPA, EA and the contractor.
<b>If yes, who delivers this service for your organisation?</b>	Environment Agency, Teleperformance and HTK	
<b>Is responsibility for delivery shared with others? (*delete as applicable)</b>	Yes	
<b>If yes, who are your partners?</b>	Environment Agency and Teleperformance (call centre)	

Which of the following equality areas are relevant to this service?			
<b>Age</b>	<b>Yes</b>	<b>Disability</b>	<b>Yes</b>
<b>Gender Re-Assignment</b>	<b>No</b>	<b>Pregnancy &amp; Maternity</b>	<b>No</b>
<b>Race</b>	<b>Yes</b>	<b>Religion or Belief</b>	<b>No</b>
<b>Sex</b>	<b>No</b>	<b>Sexual Orientation</b>	<b>No</b>
<b>Human Rights</b>	<b>No</b>		

<b>Timescale for Assessment</b>	1 week	<b>Timescale for Involvement/Consultation</b>	n/a
<b>Start Date</b>	15 April 2013	<b>Completion Date</b>	25 April 2013
<b>EO Champion review by</b>	Carol Gillespie	<b>Date</b>	29 April 2013
<b>SRO Approval</b>	Pascal Lardet	<b>Date</b>	29 April 2013

**1. Identify ALL the Aims of the service (consider these questions to prompt answers)**

1. What is the purpose of the service? (consider explicit and implicit aims)
2. Who does the service affect?
3. Who does the service benefit directly? (e.g. employees/service users; equality groups, other stakeholders)
4. What results/outcomes are intended?

Floodline is Scotland's flood warning service. It aims to contribute to a more resilient and safer Scotland by providing flooding information and flood warning messages across Scotland. It also aims to improve access to this information by enabling sign up to receive free advance flood warning messages direct to a customer's landline or mobile phone, notifying them when a flood warning message has been issued for their local area.

The service is provided for all of Scotland, with two main information products: Flood Alerts (messages issued against wider geographical areas, normally matching local authority boundaries) and Flood Warnings (messages issued against an individual local warning area, so when customers register to receive flood messages they are relevant and meaningful to their local area.).

Supporting this are advice, guidance and education activities, online, by phone and in person. These are intended to help communities, organisations and individuals prepare, respond and recover. A measure of success will be the number of people signed up to Floodline, using its web service and taking action to prepare and protect.

**2. Consider the Evidence (data and information) - (consider these questions to prompt answers)**

1. What information or data would it be useful to have? What data (quantitative and qualitative) is available? (in-house/external) How reliable/valid/up-to-date is it?
2. What does the data/information tell you about
  - Different needs?
  - Different experiences?
  - Different access to services, information or opportunities?
  - Different impacts/different outcomes?
3. Are there any gaps that you should fill now/later by further evidence gathering/commissioning or by secondary analysis of existing data?
4. Are there any experts or stakeholders you should involve/consult now? Have you involved/consulted any experts already? What were their views?

Over 16,000 registered customers already use Floodline's direct warning service, and many more access it online. There is no evidence or process which enables us to accurately monitor whether any barriers to registration or use exist for any Protected Characteristic Group.

There is evidence which indicates areas of low registration (% of households identified at risk in a Flood Warning Target Area versus number of registrations current for that area). There is no evidence available

to indicate whether any of these Flood Warning Target Areas may have a higher than average number of non-native English speakers domiciled, but this may be something on which we can gain information.

Registration data also indicates that we have a fairly even split between those who have registered with gender suffixes:

- Mr (7,787)
- Mrs, Ms or Miss (6,963)
- Other Dr, Rev, Blank circa (1,250)

We do not hold for, or request information from, registered customers regarding language, disability or other potential barriers to access. An improvement to the registration process may assist in ensuring we highlight where support could be offered.

Customer feedback (gathered actively at least once a year) provides qualitative information on customer experience and opinion, to inform service improvements. No specific questions regarding any barriers experienced by Protected Characteristic Groups are asked. Changing this and widening our research work could further improve that knowledge.

Representatives of professional partners and organisational service users (e.g. emergency services, local authorities, media etc.) are invited to a twice-yearly meeting of the Flood Warning External Stakeholders Group. Extending membership of this group to include one or more representatives from an SEPA Equalities External Advisory Group should be considered to assist in improving our knowledge.

No information on our service is produced in any language other than English, or with other specific access issues in mind. We should investigate what reasonable steps might be taken to improve this.

Some information is produced for a primary school audience - <http://www.sepakids.com/> - but education resources should be revisited and expert input sought from Education Scotland so wider primary and secondary school pupil engagement can be further developed.

No information is produced with older citizens in mind and it may be that Floodline is not well understood or used by this group. We should engage with representative groups and individuals to assess if there are any concerns and any recommendations to consider as part of addressing this.

Digital channels are now more widely used for accessing public safety information; we need to adopt this more effectively.

### 3. Assess the likely impact on different groups - (consider these questions to prompt answers)

1. Does your analysis of the evidence indicate any possible adverse impact on a particular group (age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex and sexual orientation.) or does it breach human rights legislation.
2. If it is adverse,
  - Does this amount to unlawful discrimination? See guidance
3. In what areas does it have an impact? E.g. access to information, experience of services.
4. **Even if there is no evidence of adverse impact, is there an opportunity to actively promote equality or foster good relations between different groups?**

As indicated in the evidence considerations above, there are potentially ease of access implications for the disabled, older and younger citizens and from certain language backgrounds. These relate primarily to access to information and experience of service.

This does not however amount to an adverse impact and there is an opportunity to improve the service provision by gaining better feedback from different groups and using this to inform change. This might include:

- Engaging with the Equalities External Advisory Group and representative bodies (e.g. Age Concern, RNIB, RNID etc.) to look at disability access considerations
- Finding mechanisms to work with younger people through education
- Changing current feedback mechanism to improve equality of opportunity.
- Through HR, engage with any internal staff that may fit into any protected characteristic groups.
- Review registration so routes to information & service support can be flagged to customers potentially in any protected characteristic groups.

#### **4. Consider alternatives (what to do if you find adverse impact) - (consider these questions to prompt answers)**

1. How can you change your proposal in a way that is proportionate, and will
  - Remove unlawful discrimination or comply with human rights?
  - Reduce any adverse impact?
  - Advance/promote equality?
  - Foster good relations between different groups?
2. If there are none, can the service still be justified?
3. Can the aims be met in some other way? What can you do now/later?
4. What are you recommending?

The service will continue but with the following key recommendations:

- Service changes and reviews will now consider EO and include engagement with SEPA's Equalities External Advisory Group
- Active feedback and input is to be sought from representatives of protected characteristic groups.
- Enhancing/increasing education work and collaboration with key partners (e.g. Education Scotland) to be undertaken.
- Registration process and publications to be reviewed so routes to information & service support can be flagged to customers potentially in any protected characteristic groups.

#### **5. Involve/Consult formally (relevant stakeholders) - (consider these questions to prompt answers)**

1. What are the views of the people who are likely to be affected or who have an interest about
  - Whether you have identified the right issues?
  - Whether you have proposed suitable modifications?
  - Whether your proposals will meet their needs?
2. Should you involve people in the re-design of the policy?
3. How will you consult once changes have been made?
4. Whom do you need to get views from?(internally/externally)
5. What methods will you use? (consider "hard to reach" groups)

6. What formats will you use for communicating with different groups?

Following on from points already referenced:

- Service changes and reviews will now consider Equal Opportunities data and include engagement with SEPA's Equalities External Advisory Group
- Active feedback and input is to be sought from representatives of protected characteristic groups.
- Formal collaborative work with Education Scotland to be undertaken.
- Annual Customer Reminder process to include enhanced feedback opportunity
- Contact to be made with organisations already working with hard to reach groups to identify means or opportunities to engage and consult.
- In addition to online, written and telephone research, targeted focus groups/interviews with representatives of identified protected characteristic groups will be considered, to reduce potential barriers to engagement.

**6. Decide whether to adopt this service - (consider these questions to prompt answers)**

1. What were your findings from the consultation?
2. Taking into account all of the data, information, potential impact issues and consultation feedback, what will you recommend?
  - Reject the policy – there is evidence of actual/potential unlawful discrimination or breach of human rights.
  - Accept the policy – The EIA demonstrates the policy is robust with no adverse impacts and all opportunities to promote equality/foster good relations have been taken.
  - Modify the policy – Adjust the policy to remove barriers or better promote equality
  - Continue with the policy – Issues with the policy have been identified but you wish to continue with the policy. Clearly set out justification for doing this. Compelling reasons will be needed.
3. If the EIA is on a high level policy/strategy state here if further EIAs need to be carried out on projects emanating from the policy/strategy and inform project managers.

Continue with the current service but modify with the actions already highlighted.

**7. Make Monitoring (and review) Arrangements - (consider these questions to prompt answers)**

1. How will you know what the actual effect of the service is?
2. In what ways will you monitor? e.g. continuously or irregularly, quantitative methods such as surveys, qualitative methods such as interviews
3. How often will monitoring information be analysed?
4. When will you review the service taking into account any monitoring information?

- Annual customer survey feedback will provide qualitative information to inform us of service success.

- Additional Floodline customer research which incorporates Equal Opportunities data will add to this.
- Environment Agency/Teleperformance 'mystery shopping' will further inform us of any issues with way service is delivered.
- APS and Enquiry & Registration Team monitor and deal with other feedback

## 8. Equality Impact Assessment review

Please forward the completed document to your equality champion for review. This should then be approved by the SRO and kept on file.

## 9. Summary of Actions

List any actions agreed and indicate dates for review.

Summary as follows:

- Service registration – review process and publications to ensure Equal Opportunities data is considered (review April 2014)
- Service awareness and access – engage with some of the relevant protected characteristic groups (review April 2014)
- Service reviews/changes – utilise SEPA Equalities External Advisory Group (Begin at first meeting after publication of this document and review 2014)
- Service reach (youth) – establish formal partnership with Education Scotland (begin April 2013, Review April 2014)
- Service channels - digital channels (online and smartphone mobile website) to be improved or created. (Begin April 2013, review April 2014)