

Finance and Resources Committee – 21 June 2011

Equality and diversity impact assessments for projects

Executive summary and recommendations

Introduction

In the March 2011 Finance & Resources Committee meeting, the executive was asked to prepare a paper on how equality and diversity is assessed around project work and the plans the executive had for the future of these assessments on projects.

Historic approach

HPC has been running a project function since its inception in 2001. From this time the approach and management of projects has become increasingly more sophisticated and structured. This has been due to the size of the organisation, the demand for greater control, and the increase in sophistication and complexity of projects.

As the project function has evolved so too has HPC's effort and sophistication around company-wide policies such as the use of plain English in our publicly facing literature, the implementation of our Welsh Language responsibilities, adapting to changes in Freedom of Information and Data Protection requirements, dealing with matters around Information Security and HPC's requirements in the area of equality and diversity.

HPC has always been committed to preventing discrimination, valuing diversity and achieving equality of opportunity in all that we do. However, it is true to say that the way in which equality and diversity requirements were addressed in projects in 2001 is quite different to action that has been taken on more recent projects.

In the first major project, the development of a Registration system (LISA) (live in July 2003), close attention was made to the font sizes, look-and-feel, colour contrast and usability of the system but there was no structured mechanism in place to systematically evaluate these areas of importance.

In contrast, the online LISA authentication project¹ (live in 2006) specifically formed a working group with members from Communications, IT and Registrations to focus on the usability and accessibly of the system.

More recently, the online renewals project (live in February 2010) took even greater efforts to imbed equality and diversity requirements directly into the design of the

¹ The Online LISA authentication project gave registrants the ability to update their personal details online.

system from inception. The tender request, non-functional and functional requirements laid clear very specific usability and accessibility prerequisites. For example, to make the website easy to view, it was designed in accordance with guidelines laid down by the Web Accessibility Initiative (WAI) and was aimed, wherever possible, to ensure it conforms to 'Triple-A' standards. Measures taken to ensure accessibility include using meaningful ALT text for all images to provide descriptive text, using descriptive hyperlink text, avoiding the use of frames, which are difficult for special browsers to interpret, using an easy-to-see web colour scheme and using an easier to read non-serif font type, size and colour. External usability and accessibility experts were brought in to design the system and following development, accessibility and usability of the system were specifically tested on its target audience.

Registrant Communication Preferences project (live in March 2011) was rolled out specifically to allow Registrants to be communicated with via their preferred language of communication i.e. English or Welsh and their preferred communication format i.e. Braille, large print or audio etc.

In the latest Major Project, FTP case management system (roll out due end 2011), equality and diversity was one of the major considerations when evaluating and selecting the software product. Once again the tender, functional and non-functional requirements specifically addressed criteria around accessibility and usability and as a result the chosen product has been specifically designed to be useable and accessible for those who have visual or hearing impairments as well as those with motor, cognitive or learning disabilities. It too follows the World Wide Web Consortium (W3C) guidelines for best practice web building. Other features include having a high contrast version to make the system easy to see and has been tested using the JAWS screen reader by Freedom Scientific and the ability to be controlled by keystroke only.

Projects have increasingly paid more and more due attention to equality and diversity requirements however, it is now time to improve the way these decisions are discussed and documented.

Current approach

From this financial year (April 2011) all newly initiated Major Projects will conduct a systematic assessment of the impact of the outcomes of a project on different equality target groups. Where necessary, an action plan to address or influence the development of a project will be developed specifically to focus on the effected equality target groups. The two questions project board will consider are what negative impacts might there be and which groups will be effect by these impacts?

Documentation

Newly initiated Major Projects will complete the *project management equality & diversity impact assessment form* and if an equality group is identified as being effected by the outcome of the project then the project board will complete an *Equality and Diversity Action Plan.* Both of these documents are attached.

Review

This process will be reviewed at the end of the financial year and revised if and when appropriate.

Decision

This paper is for information only. No decision is required.

Background information

HPC has been running a project function since its inception in 2001. From this time the approach and management of projects has become increasingly more sophisticated and structured. This has been due to the size of the organisation, the demand for greater control and constraints, and the increase in sophistication and complexity of the projects themselves.

The project function consists of a project portfolio manager (Claire Reed) and two project managers (Denise Risman and Paul Nevin). They are responsible for managing the delivery of HPC's major projects.

Resource implications

The forms will be completed by the project board at the project initiation stage and will form part of the Project Initiation Document (PID).

The time taken to prepare a PID varies depending on the nature and complexity of the project however; the completion of the *project management equality & diversity impact assessment form* and the *equality and diversity action plan* will take a very small proportion of this time and will not create a significant burden on the project team.

Financial implications

Because the completion of the *project management equality & diversity impact assessment form* and the *equality and diversity action plan* will be completed as part of project initiation, there is no additional cost to the project team.

However, there may be a cost to implement the action as a result of the identification of equality and diversity considerations. Any such costs will form part of the project budget.

Appendices

Project management equality & diversity impact assessment form

Equality and Diversity Action Plan

Date of paper 29 May 2011

Project management equality & diversity impact assessment

| Project Name: | Project name |
|---------------|--------------|
| Release: | 1.0 |
| Date: | |
| Author: | Author |

Document History

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Approvals This document requires the following approvals. Signed approval forms are filed in the project files.

| Name | Signature | Title | Date of Issue | Version |
|--------------|-----------|-------|------------------|---------|
| Project lead | | | | |

Distribution This document has been distributed to:

| Name | Title | Date of Issue | Version |
|---------------|-------|------------------|---------|
| Project Board | | | |
| EMT | | | |

Purpose

HPC is committed to preventing discrimination, valuing diversity and achieving equality of opportunity in all that we do.

To this end, the project board is responsible for

- conducting a systematic assessment of the impact of the outcomes of a project on different equality target groups.
- Developing and documenting an action plan to address or influence the development of a project with regard to the effected equality target groups

Consideration

When completing this form the two questions that the project board should consider are:

- What positive and negative impacts do you think there may be?
- Which groups will be effect by these impacts?

Legislation

In recent years, UK government policy has moved from legislating to ensure that public bodies treat all people they impact equally; to legislation to ensure that public bodies positively promote a diverse and inclusive society.

We are required to meet the general duties under relevant equality legislation, including:

- Race Relations Act 1976;
- Disability Discrimination Act 1995

The legislation also requires some public bodies to meet certain 'specific duties' such as publishing a scheme. We are not one of those bodies but decided that, as part of good practice, we would go beyond what the law requires and publish an equality and diversity scheme.

More information about HPC's Equality and Diversity Scheme can be found at <u>http://www.hpc-uk.org/aboutus/equality/</u>.

People to consider

When completing this form it is important to consider the diverse range of people we interact with, including:

- the public, especially complainants or witnesses in fitness to practise proceedings;
- registrants and potential registrants;
- users of registrants;
- education and training providers;
- health care providers, professional bodies, consumer groups and other partner organisations; and
- our employees and the "partners" who carry out tasks on our behalf.

It is also important to ensure we do not discriminate against people on the basis of:

- Disability. E.g. disabled people, people with mental health problems or vulnerable people;
- Age. Eg. children and young people, older people
- Gender. women and men
- Sexual orientation. Eg. lesbian, gay, bisexual and transgender people,
- Race Eg. minority ethic people including gypsy/travellers, refugees & asylum seekers
- Religion. Eg. people in religious/faith groups

Which groups does the project board think will be affected by this project? (Tick those relevant)

| Equality group effected | $\mathbf{\nabla}$ | Description of impact (What impact do you think there may be?) |
|------------------------------------|-------------------|---|
| Disability | | |
| Disabled people | | |
| People with mental health problems | | |
| Vulnerable people | | |

| Age | |
|---------------------------|--|
| Children and young people | |
| Older people | |

| Gender | |
|--------|--|
| Women | |
| Men | |

| Sexual orientation | |
|--------------------|--|
| Lesbian | |
| Gay | |
| Bisexual | |
| Transgender people | |

| Race | |
|---------------------------|--|
| Minority ethic people | |
| Refugees & asylum seekers | |

| Religion | |
|----------------------------------|--|
| People in religious/faith groups | |



Equality and Diversity Action Plan for Project Name

DATE: / /

| | Equality group effected | Area of project/description of impact | Action proposed | Person responsible | In Risk Log? | In Issues Log? |
|----|-------------------------------|---|--|-----------------------|--------------------|----------------------|
| 1. | People with visual impairment | This enhancement to the website will only be accessible to visually able people | Include W3C as a functional requirement in the functional specification for the build | Technical lead | N | Y |
| 2. | Non-English speaking users | This enhancements to the website is focused on minority groups but is planned to only be in English | Provision the website to interchange between English and the 5 highest non-English languages in the UK. | Technical lead | Y | N |
| 3. | | | | | | |