Evidencing Equal Outcomes
in Customer Care

A self-assessment toolkit for social landlords in Wales

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Introduction

Aims

This toolkit looks at the equality impact of the customer care functions of a housing association and forms the third part of our Equal Outcomes series which is designed to provide practical advice and information on equality issues to practitioners in the social housing sector.

The toolkit can help you:
- explore the impact of customer care policies and practices on diverse groups
- identify and address risks and inform self-assessments required under the Regulatory Framework for Housing Associations in Wales (as amended in 2014)
- meet the requirements of the Equality Act's general public sector equality duty
- improve and deliver more appropriate services
- tackle discrimination, promote equality and lead to more inclusive and cohesive communities
- improve customer satisfaction
- collect evidence for Equality Impact Assessments
- inform Equality and Diversity Action Plans

How to use this toolkit

Before using this toolkit, you should refer to our first toolkit 'Evidencing Equal Outcomes in Social Lettings' which will provide you with detailed information on how to use this document. The first toolkit is available on our website www.taipawb.org or from Tai Pawb directly on 029 2053 7630 or info@taipawb.org

We have made some refinements to the process used in the first toolkit to make the more user friendly and to reflect the new risk based approach to regulation in Wales.

We have set out below a short outline of the self-assessment process proposed in this toolkit. Outcomes, Indicators and Story behind data will help you determine key equality issues and risks for your organisation. Risks and Actions and Performance Measures will help you develop action plans to mitigate risk and address issues – if you identify any. In order to keep this document concise, we have not provided examples of Performance Measures.

Outcomes, Sub-outcomes and Indicators are set out in reference tables on pages 8. Story behind data and Risks and Actions for each Outcome are set out on the remaining pages of this document.

The equality considerations and examples used in the toolkit are illustrative. It is not suggested that the matters set out in the toolkit are commonly experienced by all social housing providers in Wales.

Outcomes and Sub-outcomes

What is the end result of our actions?

Indicators (Statistics and People)

Where are we now?

Story behind data

How do we find out more?

Risks and Actions

What risks did we identify? What will we do to mitigate risk?

Performance Measures, e.g.

How much did we do? How well did we do it? Is anyone better off?

Fig 1. Process for investigating, measuring and monitoring outcomes used in the toolkit

Outcomes and Sub-outcomes

Outcomes and Sub-outcomes are intended to answer questions such as, "What is the end result of our actions?" or "What do we want to achieve for tenants?"

This is where, in partnership with tenants, you can decide what you are striving to achieve in terms of the impact on tenants' lives. The rest of the process will help you determine whether or to what extent you have achieved the Outcomes and Sub-outcomes you have agreed.

An example of an Outcome would be "Tenants and service users' needs are at the heart of delivering effective and appropriate customer care".

Indicators – Statistics and People

Indicators should help to answer the question, "Where are we now?" on achieving your Outcomes. It is at this stage that you investigate and identify any issues or risks.

We have divided Indicators into: **Statistics** (hard data) and **People** (soft data such as feedback from tenant engagement activities or the content of complaints). This approach is different from the first toolkit where indicators were purely statistical and the "People" section was part of the Story behind the data. We recognise that soft data can also serve as an Indicator of issues alongside Statistics (especially where Statistics have not yet been collected or user groups are too small for Statistics to have any significant meaning).

Story behind data

This part of the toolkit helps to answer the question, "How do we find out more about where we are?" in relation to Outcomes.

This is a list of examples of helpful questions that you can ask yourself about the service area to find out more about risks and potential issues.

Risks and Actions

By this point you will have identified whether there are any equality issues related to the service being assessed This is where you identify what risks these issues pose to the organisation and its tenants. In this section you list what risks you have identified and plan actions to mitigate those risks.

Performance Measures

Providing examples of Performance Measures is beyond the scope of this toolkit. However, this step is included in the process diagram to indicate where Performance Measures can be used to determine whether the implemented actions have worked.

> For more information on Performance Measures in relation to equality, contact Tai Pawb.

The Toolkit

List of Outcomes and Sub-outcomes

Outcome

Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care.

Sub-outcomes

1.1.   Tenants and service users are treated with respect and understanding by all staff.

1.2.   Tenants and service users find it easy to contact and interact with the organisation regardless of their needs.

1.3.   Tenants and service users receive communications in the format and the language that they need.

1.4.   Tenants and service users who need additional support are assisted, signposted and supported.

1.5.   Tenants and service users with diverse needs are consulted in a meaningful way in order to shape services, review performance and develop plans for the future.

1.6.   All tenants and service users understand the complaints procedure and feel their complaints are treated seriously and fairly.

Outcome - Reference Table

Outcome	Sub-outcomes	Indicators		Story behind the data & Risks and Actions
		Statistics	**People**	
Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care	1.1 Tenants and service users with protected characteristics are treated with respect and understanding by all staff	Satisfaction levels broken down by protected characteristic and compared with satisfaction levels for those without those characteristics	Content of the comments section of satisfaction forms Feedback from mystery shopping carried out by diverse groups	Go to pages 11 and 12
	1.2 Tenants and service users find it easy to contact and interact with the organisation regardless of their needs	Number of incoming contacts by method and protected characteristic Satisfaction levels broken down by protected characteristic	Consultation with diverse groups on ease of use of contact systems, accessibility of contact systems and contact preferences	Go to pages 13,14 and 15
	1.3 Tenants and service users receive communications in the format and the language that they need	Number of outgoing contacts by method cross checked with profiling data on preferred method of communication Satisfaction levels broken down by protected characteristic	Reasons behind tenants not fulfilling their tenancy obligations e.g. non-payment of rent	Go to pages 16, 17 and 18
	1.4 Tenants and service users who need additional support are assisted, signposted and supported	Number of referrals for additional support and number of instances where additional support was provided Number of tenancy failures by protected characteristic	Discussions with organisations receiving tenant referrals Focus group with diverse tenants and service users who used a specific service	Go to pages 19 and 20

Outcome - Reference Table

Outcome	Sub-outcomes	Indicators		Story behind the data & Risks and Actions
		Statistics	**People**	
Tenants' and service users' needs are at the heart of delivering	1.5 Tenants and service users with diverse needs are consulted in a meaningful way in order to shape services, review performance and develop plans for the future	Number of tenants consulted, engaged or involved in scrutiny or other tenant groups by protected characteristic Number of Equality Impact Assessments undertaken compared with policies reviewed that year	Changes made as a result of tenant input	Go to pages 21 and 22
	1.6 All tenants and service users understand the complaints procedure and feel their complaints are treated seriously and fairly	Number of complaints made by protected characteristic Levels of satisfaction with the complaints procedure by protected characteristic	Content and type of complaints	Go to Page 23 and 24

Outcome:

Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care

→ 1.1 Sub-outcome

1.1   **Tenants and service users with protected characteristics are treated with respect and understanding by all staff**

→ Story behind data

Questions to consider:

- Do staff and contractors see equality and diversity as part of their role?

- Do your supply contracts incorporate any clauses on equality?

- Are staff regularly trained on equality and diversity issues?

- Do frontline staff know how to communicate with people with language and other accessibility needs? Do they know where to get additional advice about this?

- Do tenants and service users have adequate opportunities to regularly feedback their experiences through satisfaction forms etc?

- Do tenants and service users with protected characteristics know how to make complaints?

- Do you have a clear procedure for dealing with complaints of discrimination?

- Are your contractors aware of the need for satisfaction forms to be handed out after work is completed?

→ Risks and Actions

Low numbers of staff given equality and diversity training because

Risks	Actions
• Pressure on budgets means training is not provided frequently	→ ✓ Identify staff who have not undergone equality and diversity training and ensure it's given as soon as possible
• High turnover of staff since last training sessions were held	✓ Ensure equality and diversity training is part of the induction procedure for all new staff

Outcome: Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care

→ Risks and Actions

Contractors are not aware of their equality and diversity responsibilities because

Risks	Actions
• There are no conditions in supply contracts around equality and diversity	✓ Ensure the requirement for equality and diversity training is added to the contract conditions for contractors
• Contractors are not aware of the organisations code of conduct on equality and diversity	✓ Make contractors aware of your code of conduct on equality and diversity and your expectations of them
• Contractors have not undergone equality and diversity training	✓ Monitor contractors' performance on equality and diversity including through feedback forms and consultation with tenants

Tenants and service users are unable to report bad practice because

Risks	Actions
• Policies and processes to complain about staff or report bad practice are inaccessible to some tenants with particular protected characteristics	✓ Equality impact assess policies and procedures relating to complaints to identify any potential barriers for particular groups of tenants
• There is low awareness of how to complain within particular groups of tenants	✓ Identify how to increase awareness of the complaints procedures with any groups that have low awareness
• Tenants and service users are not asked to feedback their satisfaction with the conduct of staff	✓ Ensure staff are aware of the importance of handing out satisfaction surveys to all tenants and identify any accessibility problems with returning forms

1.2 Sub-outcome

1.2   **Tenants and service users find it easy to contact and interact with the organisation regardless of their needs**

Story behind data

Questions to consider:

- Are tenants and service users who have protected characteristics using different contact methods to those tenants and service users without those protected characteristics or are they not contacting the organisation at all?

- Is information on how to contact the organisation available in a range of formats?

- Is every staff member who requires access to details on an individual tenant's communication needs able to access it? Is this information being used when meeting with the tenant?

- Are tenants and service users willing to give the organisation information on their communication needs?

- Are staff aware of how to make use of available services to enable them to communicate to all tenants e.g. Language Line or where to source translation services?

- How up to date is your customer profiling data? Have you asked tenants in what forms they would like or prefer to contact you?

- When are your tenants likely to be unavailable for appointments? Are there particular times and days which may be unsuitable for some tenants?

Outcome: Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care

Risks and Actions

Tenants and service users with language or communication difficulties are unable to interact with the organisation because

Risks	Actions
• Tenant profiling data is out of date	✓ Ensure customer profiling data is up to date and identified gaps are addressed
• Tenants and service users have not been consulted on the communication methods they would prefer	✓ Consult with tenant groups representing those with protected characteristics on how they would prefer to be able to contact the organisation
• The leaflets in your offices are not available in appropriate alternative formats or languages	✓ Ensure frequently requested literature is available in languages and formats that are likely to be needed
• There are no facilities to enable tenants with hearing impairments to take part in meetings	✓ Check audio equipment such as hearing loops regularly and ensure it is maintained frequently and staff know how to use it
• Processes for reporting language and communication barriers are inaccessible	✓ Ensure complaints processes are accessible to all tenants and service users

➡ Risks and Actions

Tenants are unable to visit offices of the organisation or meet with staff because

Risks	Actions
• Home visits are only made and your offices are only open when people are at work	✓ Hold meetings, home visits and appointments at times when tenants are available and not just during office hours
• Home visits do not take into account cultural requirements relating to the propriety of meeting men or women on their own	✓ Train staff to check customer profiling data prior to home visits to check if there is any information staff need to be aware of and that staff understand the importance of acting on this information
• Meetings held do not take the times of religious activities into account	✓ Avoid holding meetings on days or at times which are likely to conflict with religious or cultural requirements

Staff do not communicate appropriately with tenants with protected characteristics

Risks	Actions
• Staff members use the wrong title when communicating by telephone with transgender tenants or assume they are speaking to the wrong person	✓ Provide training on gender reassignment to all staff and use neutral language when on the telephone
• There is nowhere in your offices where visitors are able to discuss sensitive issues, such as sexual orientation, with staff	✓ Provide areas where tenants are able to have discussions with staff in confidence

Outcome: Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care

→ 1.3 Sub-outcome

1.3   **Tenants and service users receive communications in the format and the language that they need**

→ Story behind data

Questions to consider:

- Are staff aware of the need to adapt communication methods?

- Is customer profiling information held and used on how individuals would prefer to be contacted?

- Does the number of letters sent out in alternative formats match the number of tenant households who need them based on your customer profiling data?

- Is information on how individuals would prefer to be contacted used effectively by every department of the organisation? Are there any departments or computer systems unable to access that data?

- Can you record the data that tenants and service users give you effectively? Do your computer systems allow for the complex tailoring of tenant and service user need with the result that it can take into account the impact of more than one protected characteristic, such as recording both a language need and a visual impairment?

- Have the costs of translation and alternative formats been considered when any project is started?

- Do all departments use accessible contact methods to the same extent?

- Have you undertaken a recent access audit of your website?

Risks and Actions

Tenants receive communications in the wrong languages or formats because

Risks	Actions

Risks

- The systems that produce your tenant communications do not talk to each other and some departments cannot access the data they need

- The system does not allow for the easy recording of tenant needs or for appropriate tailoring, such as large print information in community languages

- Budgets do not allow for translations to be undertaken

- Staff have not undergone equality and diversity training and are not aware of the need to use alternative formats or languages

- Staff are not aware of the relevant communications policies

- Staff are not aware of the different alternative formats available or how to arrange for translation

Actions

- ✓ Make sure all computer systems are able to talk to each other, minimising the number of times tenant details have to be changed and re-entered

- ✓ Use computer systems that allow easy recording and use of data in a variety of ways

- ✓ Ensure the cost of translation and alternative formats is considered when budgets are being set

- ✓ Ensure staff are trained on equality and diversity and identify any other relevant staff training needs

- ✓ Ensure staff are aware of your communication policies and assess whether any policies are in need of revision or update

- ✓ Ensure staff know what formats and services are available and how to use them and to assess whether new formats and services are required

Outcome: Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care

Risks and Actions

Information on tenants' needs is not correct because

Risks	Actions
• Information is out of date and tenants' needs have changed	✓ Plan and undertake regular customer profiling exercises to keep information up to date
• There is a low response to surveys or tenants decline to give information	✓ Use a range of means, including tenant magazines and social media, to explain to tenants why the information is needed and how it will be stored and used
• Information is not gathered at all opportunities	✓ Use opportunities to fill any gaps in data or check it is up to date e.g. when the tenant telephones you
• Information is either not passed to your contractors or inappropriate information is passed to them, such as on sexual orientation	✓ Ensure there is a policy on how and what data is provided to your contractors and that it is in compliance with the Data Protection Act

→ 1.4 Sub-outcome

1.4   **Tenants and service users who need additional support are assisted, signposted and supported**

→ Story behind data

Questions to consider:

- Are staff aware of agencies that tenants in need can be referred to and the role of each agency?

- Do processes for referring tenants take into account the wishes and needs of those tenants?

- Do you have referral and data sharing protocols with support organisations?

- Are partnership arrangements in place with key stakeholders? Do staff know how to make referrals?

- Are staff aware of local advice and support services relating to protected characteristics?

- Are there policies in place about the sharing of information, including personal information?

Outcome: Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care

Risks and Actions

Tenants with support needs do not get the support they need because

Risks	Actions
• There are insufficient local support groups for particular protected characteristics	✓ Work with tenants and service users with protected characteristics to set up local tenant groups that represent them effectively
• Local stakeholders will not accept referrals or have a poor relationship with the organisation	✓ Map out local stakeholders, look at any partnership opportunities that are available and plan future partnership working
• Tenants do not want to be referred to support groups or agencies	✓ Proactively highlight to all tenants the practical benefits that may be available through using support
• There is no information available to staff on local support organisations	✓ Make information on local support organisations available to all staff so they are better able to inform tenants and service users
• The processes for referring tenants are not clear or easily available to staff	✓ Ensure a clear process for referring tenants for additional support by working with local stakeholders
• There is no policy of identifying and monitoring tenants who may have additional needs	✓ Ensure staff can recognise the warning signs that someone may be in need of additional support and that they have the confidence to act on that information
• Staff are not aware of whose responsibility it is to assist tenants who need additional support	✓ Have clear policies on whose responsibility it is to support and refer tenants and ensure this is known to all staff
• There are no clear directions as to whom referrals should be made	✓ Have clear policies on which organisations to refer to and what other support is available and consult with tenants and service users on their views
• There are no methods of sharing necessary information with other organisations and staff do not know what they are and are not allowed to disclose	✓ Where appropriate, have clear data sharing arrangements with partners using the Wales Accord on the Sharing of Personal Information
• The support needs of tenants are not known or accessible to staff	✓ Ensure the support needs of tenants are identified during customer profiling

→ 1.5 Sub-outcome

1.5   **Tenants and service users with diverse needs are consulted in a meaningful way in order to shape services, review performance and develop plans for the future**

→ Story behind data

Questions to consider:

- How do all tenants have the opportunity to feed into consultations, reviews and plans?

- How diverse are your tenant groups? Do your tenant meetings reflect the diversity of your tenants?

- Are meetings accessible for all tenants? This may mean changes to the days on and times at which meetings are held, not just changes of venue.

- Is there clear guidance on when and how to consult with tenants?

- What effort is made to engage with seldom heard tenants, including those with protected characteristics?

- How is feedback contributed by tenants during meetings used? At what stage in any review or planning process is this information sought?

- Are adjustments made to enable all tenants to participate at meetings? Are tenants offered other ways to contribute to consultations?

- Does your board reflect the diversity of your tenants?

- Are staff who have protected characteristics involved in the consultation process?

- Are you using equality impact assessments to judge fairness of service?

Outcome: Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care

→ Risks and Actions

Tenants from diverse backgrounds are not included in consultations, reviews and planning because

Risks	Actions
• Tenants are excluded at meetings because of a lack of reasonable adjustments at meetings, such as no papers available in accessible formats or the hearing loops are turned off	✓ Ensure the needs of tenants attending meetings are met and that staff know what adjustments need to be made
• Places where meetings are held are inaccessible, including not being easily reached by public transport	✓ Hold all meetings in accessible locations, with level access, disabled toilets and good public transport links
• Meetings are held at a time which is inconvenient for some tenants, such as during working hours or they clash with religious occasions	✓ Hold meetings at times which are accessible for all individuals, minimising meetings during working hours or which are likely to clash with religious occasions
• Meetings are held in inappropriate locations, such as pubs or religious buildings	✓ Hold meetings in "neutral" buildings likely to be suitable for all tenants
• Details of consultations and meetings are not available in accessible ways	✓ Publicise meetings in accessible formats and consider the targeted contact of tenants with specific needs in addition to using normal contact methods
• Insufficient effort is made to engage with tenants with protected characteristics, particularly those who may be harder to reach	✓ Engage with local groups representing those with protected characteristics to encourage their members to come to meetings and consult with these groups when appropriate
• Tenants with protected characteristics do not believe their views will make a difference to the organisation or do not understand the relevance of their protected characteristic to the organisation, such as LGBT tenants	✓ Publicise changes that have been made to policies and procedures as a result of consultations with tenants, especially policy changes relevant to tenants with protected characteristics
• Tenants who attend consultation meetings or contribute to consultations do not reflect the diversity of tenant communities	✓ Encourage tenants with protected characteristics to come to meetings and contribute to consultations and meet with any groups that exist about the issues involved
• There is a lack of diversity amongst the board members of the organisation	✓ Consider ways in which to increase the diversity of your board, such as the use of a shadow board, co-opting tenants or individuals from poorly represented groups or adjusting the application process to give more weight to volunteer work, community engagement, expertise in a protected characteristic rather than focusing on an individual's career or employment record alone

→ 1.6 Sub-outcome

1.6   **All tenants and service users understand the complaints procedure and feel their complaints are treated seriously and fairly**

→ Story behind data

Questions to consider:

- Are all tenants and service users able to access the complaints procedure?

- Is there any difference in the type of complaint made by those with protected characteristics?

- Do those with protected characteristics get the same outcomes from their complaints as those who do not have protected characteristics?

- Are any groups making repeated complaints?

- Are any groups less satisfied with the complaints procedure than others?

- Is there a clear process for reporting complaints of discrimination?

Outcome: Tenants' and service users' needs are at the heart of delivering effective and appropriate customer care.

→ Risks and Actions

Tenants from particular groups feel that they are not treated fairly resulting in dissatisfaction and loss of reputation because

Risks	Actions
• Not all tenants can complain as there is an over-reliance on particular communication methods for complaints, such as written formats or telephone calls	✓ Equality Impact Assess the complaints process to ensure it takes into account the accessibility needs of all tenants
• Those with protected characteristics do not know about the complaints procedure or how to make a complaint	✓ Promote the complaints procedure in accessible ways as well as through tenant groups for those with protected characteristics
• Those with protected characteristics make frequent and repeated complaints because the issues faced by them are not dealt with adequately first time around	✓ Analyse the type of complaint made and consult with tenants to assess the reasons behind repeated complaints
• Support is not provided to tenants to achieve the desired outcome	✓ Use both internal and external support mechanisms, such as local groups, to support tenants who are making complaints
• Tenants with sensitive protected characteristics, such as a mental health issues, do not want to disclose this information in making a complaint	✓ Ensure tenants are aware of the organisations confidentiality and Data Protection policies and the importance of disclosing all relevant information to a complaint in getting the appropriate resolution