

**Impact Assessment – Race Relations Act
1st Stage – Initial Screening
Customer Case Management - Phase 1**

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0.1 Document Control

0.2 Key Personnel

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0.3 Summary

This document provides consideration to the impact of the Race Relations Act on the changes to DCS arising from the implementation of CCM Phase 1.

0.4 Version History

Version	Date	Summary of changes	Changes marked
0.00a	21/6/05	Initial draft	N/a
0.00b	07/07/05	Signed off	N/a

0.5 References

No.	Doc reference	Document title
1	NMB C1.1	NMB Business Design Review and Update – Processes for CCM Phase 1
2	NMB C1.2	Business Design Review and Update – Organisation and Roles for CCM Phase 1
3	NMB C1.3	Customer Experience Design Review and Update.

0.6 Distribution

For information only. Sign-off required from DCS HR Policy.

0.7 Abbreviations

Please refer to the Standard CCM Abbreviations/Glossary/Background document.

0.8 Contents Page

0.1	DOCUMENT CONTROL.....	2
0.2	KEY PERSONNEL.....	2
0.3	SUMMARY.....	2
0.4	VERSION HISTORY.....	2
0.5	REFERENCES.....	2
0.6	DISTRIBUTION.....	2
0.7	ABBREVIATIONS.....	2
0.8	CONTENTS PAGE.....	3
1	INTRODUCTION.....	4
1.1	EXECUTIVE SUMMARY.....	4
1.2	BACKGROUND.....	4
1.3	PURPOSE.....	5
1.4	SCOPE.....	5
1.5	STRUCTURE OF THE DOCUMENT.....	5
2	AIMS OF ccm AND THE INITIAL SCREENING.....	7
2.1	WHAT IS THE PURPOSE OF THE FUNCTION AND PROPOSED PROJECT?.....	7
2.2	WHO IS AFFECTED BY IT?.....	8
2.3	WHO IS THE POLICY INTENDED TO BENEFIT AND HOW?.....	9
2.4	IS THERE ANY EVIDENCE THAT GROUPS HAVE DIFFERENT NEEDS, EXPERIENCES AND PRIORITIES IN RELATION TO THIS PARTICULAR PROPOSAL? ...	10
2.5	COULD THE PROPOSED POLICY HINDER EQUALITY OF OPPORTUNITY AND/OR DAMAGE GOOD RACE RELATIONS?.....	10
2.6	DOES THE PROPOSED POLICY PROVIDE AN OPPORTUNITY TO PROMOTE EQUALITY OF OPPORTUNITY AND/OR GOOD RACE RELATIONS MORE EFFECTIVELY EITHER WITHIN THE ORGANISATION OR IN THE WIDER COMMUNITY?.....	11
2.7	DO WE HAVE TO GO OUTSIDE OUR 'NORMAL CHANNELS' OF INFORMATION TO ELICIT DATA TO INFORM THE SCREENING PROCESS AND HELP REACH AN INFORMED DECISION?.....	11
2.8	KEY ISSUES.....	12
2.9	CONCLUSION.....	12

1 INTRODUCTION

1.1 Executive Summary

The Race Relations (Amendment) Act 2000 places a general duty on public authorities to:

- Eliminate racial discrimination;
- Ensure equality of opportunity for people from all ethnic backgrounds; and
- Promote good race relations.

Specifically, the legislation requires the Department to assess all its functions for race equality impact and to set out its plans for addressing priority areas where we feel that the general duty is not being delivered.

The Impact Assessment Framework has been developed in conjunction with the Home Office and the Commission for Racial Equality (CRE), who set up a Steering Group for the purpose of developing a tool that could be used across Government. DWP were part of this Steering Group, as were several other Government Departments to develop this Race Impact Assessment tool. It is important that all policies are assessed for their impact on racial equality.

For the purpose of this document, Customer Case Management (CCM) Phase 1 will go through the initial screening process of an Impact Assessment Framework to determine any relevance to race equality.

There are two levels of Impact Assessment. The first level is when the proposed policy is screened for relevance to race equality. The second level forms the main part of the framework and outlines questions and practical issues that inform a full Impact Assessment.

1.2 Background

CCM Phase 1 is a primary enabler for the significant internal efficiencies and improvements to customer services planned through Disability Carers Service (DCS) Strategic Solution.

It is an IT-supported process, which has a number of facets. It is a framework that provides structured guidance that steers the Disability Living Allowance/Attendance Allowance (DLA/AA) Decision Maker (DM) through the process of considering the customer's stated needs, gathering evidence appropriate to the specific impairment(s), and considering it in the context of the relevant medical facts about the disabling condition(s).

It highlights those key issues that the DM needs to consider with regard to each of the stated disabilities, providing the specific questions to be answered. The DM then considers this information holistically within a structured process in order to make a consistent and accurate decision.

The initial RRA Impact Assessment screening will enable the CCM project to:

- Take account of any needs, circumstances and experiences of those who may be affected by the introduction of CCM (customers and staff);
- Where appropriate, identify actual and potential inequalities in outcomes; including unlawful racial discrimination;
- Where necessary, consider alternative ways to achieve the aims of CCM, so that any adverse impact is removed.

1.3 Purpose

The purpose of this document is to look at the first level of the Impact Assessment, which is the initial screening. If it is considered that the introduction of CCM has no relevance to race equality, from a customer or staff perspective, then sign-off will be required from HR Policy to this effect.

This document is based on the Race Relations Act (RRA) Impact Assessment Framework and its supporting guidance. The outputs from this document will determine whether CCM is RRA compliant and whether a full Impact Assessment is required.

The Impact Assessment Framework has been written to provide practical assistance when planning and carrying out assessments, as required under the specific duty to assess and consult on proposed policies.

The aim of the RRA Impact Assessment is to make race equality central to the way public authorities work. Promoting race equality will help drive up service standards and ensure that the benefits are experienced equally across racial groups.

1.4 Scope

The scope of this product is limited to looking at any impact on customers or staff as a result of the introduction of CCM and its compliance with RRA.

1.5 Structure of the Document

Section 1 of this document provides an overview of the RRA and a background to the CCM project. Section 2 details the standard suggested questions, which have been extracted from the first part of the RRA Impact Assessment Framework – the initial screening. These apply to any impact on customers and staff.

All proposed policies should be at least screened for their potential relevance to race equality. Given the principles of relevance and proportionality underpin the general duty, the time and resources given to Impact Assessment and consultation will differ according to the relevance of the function and proposed policy to racial equality. For example, the level of

relevance will inform decisions about the extent of data collection and analysis around a proposed policy and/or how much consultation is undertaken.

2 AIMS OF CCM AND THE INITIAL SCREENING

DWP have a legal responsibility to carry out the requirements of Race Relations (Amendment) 2000. It applies to every function of the Department and its delivery businesses. In order to do this the Department needs to ensure that race equality is considered in every area, from the way policies and services are delivered to how recruitment and staff are managed, so that their contribution is valued and staff potential is maximised. It makes good business sense to have a diverse and multi-cultural workforce, to reflect the wide customer base that the Department serves and to make the most of the skills and talent available.

The Human Resources race equality scheme sets out the key achievements and priority areas for the Department as a whole. The approach to training will contribute to the development of the Department's workforce, resulting in an appreciation of the needs of individuals, equipping people with the necessary techniques to interact with customers, so providing a consistent and effective customer service.

The 'Realising Potential' development programme is a corporate scheme within the Department aimed at providing targeted developmental opportunities for ethnic minority staff to enable them to compete on merit for jobs and promotion.

The next section details the initial screening element of the impact assessment and the conclusion of this will inform whether a full impact assessment is required. The questions (mentioned at para 1.5) are listed below with a response from a CCM perspective.

2.1 What is the purpose of the function and proposed project?

CCM is an IT-supported process which provides structured guidance which steers the Disability Living Allowance/Attendance Allowance (DLA/AA) Decision-Maker (DM) through the process of considering the customer's stated needs, gathering evidence appropriate to the specific impairment(s) and considering it in the context of the relevant medical facts about the disabling condition(s).

It highlights those key issues that the DM needs to consider with regard to each of the stated disabilities, providing the specific questions to be answered. The DM then considers this information holistically within a structured process in order to make a consistent and accurate decision.

CCM aims to contribute to the achievement of:

- Consistency of the use of medical evidence;
- Greater consistency of decisions;
- Consistency of awards;
- Improved management information.

CCM Phase 1 is designed to test the effectiveness of the guidance and minimise delivery risk, in respect of the Strategic Solution, aimed at computerised support for DMs. CCM Phase 1 will deliver a business release to two Pioneer sites; Bootle DBC and Manchester DBC. There will be up to a maximum of 150 DCS operational users in total between these sites.

As CCM is a new system, there will be changes to the existing processes in the following areas:

- Registration;
- Evidence Inputting (Data Entry) / Evidence Gathering;
- Decision-Making;
- Monitoring;
- Management Information (will be evaluated by the CCM Project Team, used by the operational manager to manage their business and used by DCS Operational Research (OR)).

2.2 Who is affected by it?

Customers

CCM will impact DLA and AA customers, their representatives, other Government and non-Government Departments and Agencies which link to DCS, such as The Appeals Service (TAS), Citizens Advice Bureau (CAB), ATOS Origin etc.

It is vital that colleagues and customers from different backgrounds are treated with the respect they deserve. This means, where possible, being aware of the cultural backgrounds of individuals and being sensitive to and respectful of their customs.

Staff

CCM Phase 1 will provide Decision Makers (DMs) at the Pioneer sites, which are Manchester and Bootle DBC with on-line up to date medical and legislative guidance and will ensure that all DMs apply a consistent approach to evidence gathering and decision-making, considering all the information holistically, within a structured process, in order to achieve improved accuracy and quality of decisions.

Other affected staff

Customer Services teams from the Pioneer sites will also be influential in maintaining contact with customers and their representatives. Calls and enquiries normally handled by Helpline and Central/Written Explanations Teams (CET/WET) will be diverted to the Pioneer site responsible, so that all activity relating to the test is dealt with in these locations.

All activity at the Pioneer sites is being supported by different strands of the CCM Project team, namely:

- Technical team;
- Guidance/content team;
- Implementation;
- Corporate Medical Group;
- DCS Operational Research.

2.3 Who is the Policy intended to benefit and how?

Customers

CCM will improve the experience of our customers by:

- Using a structured DLA New Claim form, which will be tailored to the customer's needs;
- Supporting and simplifying claim form completion;
- Enabling DCS to ask the customer to provide the appropriate information at the outset, reducing the need for unnecessary information and/or duplication of information;
- Enabling DCS to gather more structured, relevant and consistent responses from customers;
- Providing more detailed reasons for decisions to the customer, (consequently, they are less likely to require further written or verbal explanations).

Staff

To benefit staff, CCM will also:

- Provide up to date and comprehensive guidance;
- Resolve many of the current difficulties faced by DMs;
- Support accreditation to better support DMs;
- Enable staff to provide a better customer service by focussing on each customer's individual requirements.

The benefits that CCM will bring for DCS efficiency are:

- Greater consistency in performance;
- Improved quality of decision-making;
- Improved Management Information;
- Better evidence gathering.

2.4 Is there any evidence that groups have different needs, experiences and priorities in relation to this particular proposal?

Customers

No, however, CCM Phase 1 will provide an insight into how the experience of DLA customers is transformed through improvements to the decision making process. The test will include an evaluation of whether the customer found the experience supportive, accessible, non-intrusive and whether there was improved interaction with the DM. In addition, the experience of Partners and intermediaries supporting customers throughout the claim process under CCM Phase 1 will also form part of the evaluation. More detail about the evaluation can be found in product – CCM Phase 1 Evaluation Strategy.

As CCM Phase 1 seeks to evaluate the guidance as a major part of this test, services to customers with specific requirements will need to be supported by other DWP/DCS specific customer services.

Further evaluation of customers with additional requirements will be undertaken as part of the CCM Strategic Solution Customer Experience Design.

Staff

The role of the DM remains the same under CCM. The decision-making process remains the same, however, the way the DM goes through the process and the evidence they gather, is supported by CCM. The potential effect of CCM on issues such as grades, productivity, targets etc cannot be properly considered until its impact on the business has been tested and evaluated.

The most significant change to the working practice at the Pioneer sites besides using CCM itself is that the teams will deal with A-Z of claims for the targeted claims rather than dealing with all claims for a particular part of the alphabet.

2.5 Could the proposed policy hinder equality of opportunity and/or damage good race relations?

Customers

No, CCM is a standalone system that is aimed at improving consistency of decision making. In addition, a fundamental principle of CCM is to personalise / tailor the claiming process for the customer by targeting the specific information required in relation to their claim, as early as possible. The structured claim form will enable DCS to ask the customer to provide the appropriate information at the outset, so reducing the need for unnecessary information and/or duplication of information that exists in the current claim form.

Customers from different backgrounds will be treated with the respect they deserve. The DCS Accessibility Policy and guide (detailed in the Race Equality Scheme) will make staff aware of the disadvantages that may be faced by individuals from ethnic minority groups when trying to access the benefit. It will give them the information they need to ensure they communicate with customers using the most appropriate format.

Staff

From a staff perspective, CCM's remit is the provision of comprehensive, up to date guidance to support the decision-making process. It is proposed that CCM training material will be developed in accordance with Accreditation principles.

2.6 Does the proposed policy provide an opportunity to promote equality of opportunity and/or good race relations more effectively either within the organisation or in the wider community?

Customer/Staff

The impact of the introduction of CCM does not vary between different ethnic groups. DCS staff will engage with ethnic minority groups using appropriate methods, improving consultation and open, two-way communication so that our policies and services reflect customer needs.

Customer welfare groups through the Modern Service Working Group (MSWG) have been kept informed. The intention is to also make the guidance available to The Appeals Service (TAS).

2.7 Do we have to go outside our 'normal channels' of information to elicit data to inform the screening process and help reach an informed decision?

No, CCM will aim to continue to deliver a high-quality service that meets the needs of customers and in particular that people from all ethnic groups are equally satisfied with our policies, the way they are implemented and the quality of our service.

Legislation has not changed and entitlement is still based on the care and mobility needs arising from an illness or disability.

For CCM Phase 1 new claims only are to be included. However, all subsequent activity arising from those new claims assessed within CCM will continue to be dealt with through CCM.

CCM Phase 1 will not have the full range of illnesses and disabilities and there will not be full functional IT available. Guidance will be available on up to 10 illnesses and disabilities. There will also be help screen guidance for up to a

further 40 'minor' illnesses and disabilities. Development on the guidance has been based on data provided by DMs through a series of data collection exercises. This has informed the sequence of development.

2.8 Key Issues

The initial screening element of the Impact Assessment will need to be considered throughout the different Phases of CCM. This document will need to be revisited at CCM Phase 2.

2.9 Conclusion

Following the consideration outlined in this initial screening which are included in the responses at section 2, the introduction of CCM does not have any adverse impact/relevance to race equality, consequently, there is no requirement to conduct a full RRA Impact Assessment.