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Olympic Delivery Authority

IT programme and projects Equality Impact Assessment

March 2009



MAYOR OF LONDON



Contents

Executive summary	4
Recommendations	5
1 Introduction	7
2 Aims and objectives of the IT programme	9
2.1 Vision, aims, values and principles	9
2.1.1 IT Principles	9
2.1.2 Governance and compliance.....	9
2.1.3 Technology.....	9
2.1.4 Services	10
2.1.5 Data and information.....	10
2.1.6 IT staff and sourcing.....	10
2.2 Critical success factors for the IT programme plan	11
3 IT Programme in ODA	12
3.1 IT management structure	13
3.2 Roles and responsibilities	13
4 ODA E&I policy commitment and strategy.....	16
4.1 ODA Integrated Equality Scheme 2009	16
4.2 Focus of this EqIA.....	16
5 Key project areas in the ODA IT programme.....	17
5.1 Key project areas	17
6 Key E&I issues.....	19
6.1 Employment.....	19
6.2 Business opportunities.....	19
6.3 Equipment.....	19
6.4 Communications	19

6.5	Integration of capability	20
6.6	Inclusive design.....	20
6.7	Community engagement	20
7	Impact Assessment	21
7.1	Methodology.....	21
7.2	Desk research	21
7.3	Interviews	22
7.3.1	Current position on E&I	22
7.3.2	EqIA impact evaluation	22
8	Equality impact assessment grids	24
9	Recommendations.....	33
9.1	Specific recommendations	33
10	Action plan	35

Executive summary

The IT programme and projects within the Olympic Delivery Authority (ODA) and CLM, the ODA's delivery partner, have clearly been mindful of equality and inclusion (E&I). The ODA has made strides in delivering the E&I commitments set out within the ODA programme for the delivery of London 2012 Olympic Games and Paralympic Games.

There is considerable policy focus on E&I throughout the ODA. The delivery partner, CLM, is equally committed and responsible for ensuring equality. Therefore, all references to the ODA throughout this document should be seen to include CLM. This is exemplified by a series of successes in this key field of operation. E&I is a priority theme within the ODA programme. The development of systems and practices has seen E&I principles being imbedded throughout the work of the ODA. The vision for the Games is:

'To host an inspirational, safe and inclusive Olympic Games and Paralympic Games and leave a sustainable legacy for London and the UK.'

The commitment to 'an inclusive Games', is where E&I firmly sits, although it is also clearly evident in the commitment to inspiration, safety and in the legacy for the Games. The ODA IT programme and projects are required to deliver on the E&I commitments in line with all other programmes and projects.

The IT programme strategic vision is:

'To contribute to the London 2012 vision and values by delivering IT solutions and services which are aligned to the overall programme by being fit for purpose and innovative. Through doing so IT will become a trusted advisor to the business.'

There have been particular successes in a range of work the IT programme has carried out, including some level of extensive commitment and delivery to the accessibility of the systems, particularly addressing the needs of disabled people.

For example meeting staff IT needs via:

- telephony - Minicom, accessible phone screens, remote access;
- hosting and server management - accessible platforms;
- print management - accessible formats and designs; and
- General - remote accessible formats, accessible formats, compatible screen readers, text to speech.

The IT Service Desk is available during flexible timings, promoting flexible working for staff and better access for users. Service level agreements for non-standard equipment requests are aligned with standard equipment requests and support is provided for non-standard equipment. Additionally, staff are trained in advising and sourcing reasonable adjustment solutions.

The ODA's Geospatial Applications can hold E&I demographic data which could be cross-referenced against projects to measure benefits that have been realised, at project review stage.

Performance management systems have ensured E&I measures are embedded, measured and analysed across all relevant, people based KPI areas.

Whilst these successes, along with others, are clearly evident, there are some areas where the IT programme still needs to be refined, to ensure that E&I is most importantly consistent in its application, and as a result is supported and safeguarded.

Throughout this Equality Impact Assessment (EqIA) efforts have been made to ensure that the systems and practices of the ODA IT programme are working to secure the overall organisational commitment to E&I. To this end through a series of interviews and desk research the following key recommendation have been identified.

Recommendations

Some of these key issues directly address identified negative impacts, whilst some simply reflect a series of improvements which will further support the organisational E&I commitments. The EqIA has provided the IT programme and projects with clear areas which need to be addressed to ensure delivery of the ODA E&I priority theme:

- Produce and implement clear E&I standards within the IT programme, in order to mainstream good equality and Inclusion practice and to set clear performance standards. This would include:
 - standards for deliver of the reasonable adjustment policy in relation to IT provision, including standardised service level agreements;
 - minimum design standards to address equality, both within the project lifecycle and also in the monitoring and evaluation of systems; and
 - minimum accessibility standards for systems and their use.

The standards should also address the published organisational access standards, in particular with respect to design, print and communications.

- Define the roles and responsibility for the governance and review of E&I within the IT programme and projects. Work towards having clear E&I roles, defined for key parts of the IT programme and projects. It is recommended that the leadership role, to oversee the E&I components of the development of all new IT services, should rest with the Design Authority. It is also recommended that the safeguarding of the E&I commitment, through the project life cycle, should be delivered by the Capability Managers.
- Develop specific IT systems templates to deliver the E&I commitment of the organisation. It is recommended that each project business case should include a specific E&I check list or template. This would replace and indeed simplify the equality monitoring process for each new project. Additionally, it is recommended that a set of E&I considerations are included within the benefits realisation assessment and monitoring of completed projects.

- Ensure the ODA can continue to maintain its programme of reasonable adjustments, remote access, flexible working, fonts, formats and E&I within their design standards. This is good practical work that makes an effective organisation and staff impact, and it is critical that staff know how to access these information about the IT provision in the delivery of the ODA reasonable adjustment policy, and/or receive the specific access information being provided.
- Ensure that key staff, within the IT programme, attend targeted E&I training, to address their specific areas of responsibility, and to build capacity. This training would supplement corporate E&I training, but be specific to the needs of these programmes, and the delivery of E&I within the IT programme.
- Ensure that Tier 1 contractors/delivery partners (Atos and Fujitsu) complete E&I Action Plans; that specifically address the aforementioned E&I Standards for IT. To this end, these E&I Action Plans will need to be wider documents, incorporating service delivery and technological focus for E&I, as well as statutory employment actions.
- Consider the wider access to core systems information and data collected by the ODA, to ensure that good practice is shared, and that organisations can learn from the work of the ODA, especially in the area of E&I.

1 Introduction

The purpose of this assessment is to document the findings of the Equality Impact Assessment (EqIA), conducted for the Olympic Delivery Authority (ODA) and CLM, the ODA delivery partner. CLM is equally committed and responsible for ensuring equality and inclusion, therefore, all references to the ODA, throughout this document, should be seen to include the delivery partner.

Ottaway Strategic Management Limited had been commissioned to undertake a independent assessment of the equality & inclusion impacts of the ODA IT programme and projects. In particular, the EqIA seeks to examine the application of the ODA's equality and inclusion (E&I) policy commitment, within the IT programme in general and its key component elements.

Evidence has been gathered to review the IT programme, (reference to the 'IT programme' in this document includes specific projects which are currently underway or are planned as part of the IT programme) and to assess the likely and where available, actual impact on E&I, both in terms of positive and negative impacts. Efforts have been made to review the specific impacts of the ODA, partner agencies and contractors.

The EqIA will provide detailed information about the IT programme, and the likely impact upon equality and inclusion (E&I) target groups of people that traditionally experience discrimination and disadvantage, these groups include:

- age: children, young people and older people (50+);
- disabled people: as defined by the Disability Discrimination Act 1995 and 2005, including sensory or mobility impairment; people with mental health needs, people with long term illness/conditions;
- gender: women and men. The focus is generally on women because of traditional discrimination, however it is equally important to consider needs and issues faced by men;
- transgender people: focus on transgender because of traditional discrimination;
- race/ethnicity: black, Asian and minority ethnic people (BAME), and includes travellers and Gypsies, asylum seekers and refugees;
- sexual orientation/identity: lesbians, gay men and bisexuals; and
- religion and belief: people of different religions and faiths, including people who are atheists or agnostic.

Other people who traditionally experience exclusion or barriers to participation and can be excluded are:

- homeless people;
- unemployed people;
- people employed on a part time, temporary or casual basis;
- lone parents;
- people with caring responsibilities;

- people with drug and alcohol problems;
- ex-offenders; and
- people with unrelated convictions.

The EqIA will:

- Identify the issues which may cause disproportionate impact to people in the equality and inclusion target groups
- Provide evidence of how these impacts have been addressed; and
- Impacts which have not been addressed as part of the EqIA will be developed into an action plan and framework to address issues going forward

The EqIA contributes towards the ODA's fulfilment of its statutory duties to promote race, gender and disability equality, by ensuring that identified positive impacts are promoted and celebrated, and that any potential adverse impacts are identified and highlighted and any issues which require action.

The EqIA considers the delivery of the of the ODA's Equality & Inclusion programme; Equality & Diversity Strategy; and the Integrated Equality Scheme which goes beyond the statutory duties to promote race, disability and gender to include the additional equality strands of age, religion and sexual orientation, and other inclusion issues centred on socio-economic, cultural and political disadvantage.

2 Aims and objectives of the IT programme

2.1 Vision, aims, values and principles

The vision for the IT programme in the ODA is:

‘To contribute to the London2012 vision and values by delivering IT solutions and services which are aligned to the overall program by being fit for purpose and innovative. Through doing so IT will become a trusted advisor to the business.’

A clear link in this vision is the link of the IT programme to the London 2012 vision and values. These are further expressed in the IT Principles below. In these principles there is clear reference to equality and inclusion.

2.1.1 IT Principles

As set out in the IT Operational Plan, the IT programme will deliver and operate using the following overarching principles.

2.1.2 Governance and compliance

Reporting:	Provide consistent messages and reporting to the CLM and ODA executive, the ODA IT Sponsor Team and other bodies as agreed.
Ownership:	Own all key policies, procedures and standards in respect of information technology.
Collaboration:	Ensure appropriate levels of collaboration and co-operation across the programme.
Risk:	Manage all IT risk within the overall 2012 programme risk programme.
Compliance:	Comply with UK government and ODA policies and regulations, including security, information management and procurement.
Financial Management:	Projects and services will be delivered within budget and be managed in accordance with ODA financial controls.

2.1.3 Technology

Use familiar products:	Utilise applications and services familiar to the parent organisations.
Buy not build:	Use Commercial off the Shelf (COTS) solutions where value for money is optimised.
Sweat the Assets:	Use the in-situ applications and systems assets for the lifetime of the programme. In addition, minimize the number of upgrades over the programme.
Re-use:	Re-use and share solutions, applications and infrastructure where appropriate.
Secure:	All applications, services and systems will meet ODA security requirements.

2.1.4 Services

- Utilise Games Partners: Utilise Games Partner technologies and the value in kind provided through the sponsorship where costs can be optimised.
- Robust: Robust, available and accessible as required by the business.
- ITIL: Use of ITIL framework in the management and delivery of IT services.
- Measure: To measure and report on IT service effectiveness.
- Continuously Improve: To review and continuously improve the quality of services offered.

2.1.5 Data and information

- Single Version of Truth: Where possible, a single copy of information is stored and used across the programme. It should be entered once and used many times.
- Security and Integrity: Partners shall ensure the security, availability and integrity of the ODA's data/information at all times and comply with FOIA, Data Protection and The National Archives.
- Available: Documents will be made openly available in a role based, efficient manner to authorised users, to facilitate knowledge transfer and information sharing across the London 2012 Programme.

2.1.6 IT staff and sourcing

- Equality and Inclusion: IT will embrace the equality and inclusion policies.
- Regularly Review: Utilise Terms of Reference and regularly review staff skills, quality and performance.
- Outsource: Utilise outsourced capabilities, where value for money is optimised.

2.2 Critical success factors for the IT programme plan

The following success factors should be used to monitor the success of the IT programme:

The services, infrastructure and applications comply with government regulatory requirements set down as at 1 January 2008

- the cost of project delivery and service management is benchmarked against equivalent UK government and construction industry costs;
- the levels of service provided by the IT organisation meet the agreed SLA's with the business teams;
- the CLM project and service delivery mechanism complies with ODA governance and process guidelines. Where there have been exceptions to the process, they are agreed with the appropriate ODA responsible governance owner;
- the IT programme will conduct 6 Monthly end-user satisfaction questionnaires; and
- the IT organisation support the E&I principles of the ODA.

3 IT Programme in ODA

The ODA and CLM have overlapping IT requirements in the delivery of the ODA programme, therefore an integrated ODA and CLM IT Delivery and Service Management programme has been created, reporting to the Chief Information Officer and IT Sponsor Team. The organisation is made up of permanent, contract and partner staff, with a strategic driver for providing a permanent staff base. There are also contractual limits on IT staff numbers from each organisation.

It is clear that the size and skills required to deliver the IT programme for the ODA will change. The IT programme is currently made up of:

- Design Authority: providing IT Strategy, architecture and design solutions that are suitable and consistent across the Operational IT landscape;
- Project Portfolio: managing and delivering IT projects through the IT project lifestyle;
- Service Delivery: managing and delivering all IT services to for the London 2012 programme; and
- Programme Management Office: providing support, processes, procedures and controls to enable the project delivery teams to operate efficiently and comply with the governance requirements

To support the skills required, and staff employed or contracted to the ODA, two main organisations, Atos Origin and Fujitsu are in place as partners. Where expertise is needed, further more specific technical input will be resourced.

The IT programme will fulfil the vision by providing a fully integrated IT service to ODA, and provide specific fit for purpose IT services for a number of primary stakeholders, including Tier 1 Contractors and other partner and agency organisations. To provide the most effective service, the services and solutions being provided include:

- The records, document management, regulatory compliance, access control, management information, HR, finance, facilities management and legacy information for the ODA.
- The systems and infrastructure to enable ODA to manage and plan the construction and handover of the assets.
- The systems and infrastructure to support Tier Contractors in designing and constructing the venues.
- Establishing office IT services, telecoms and networks for use by ODA on the Olympic Park site.
- Access to key information for the other ODA partners and agencies
- Risk mitigation through management systems disaster recovery and business continuity capabilities.
- Approved project lifecycle methodology.
- Project change control.
- Planning dependency and cross-programme impacts.
- Finance and resource planning and reporting.

Delivering innovation is a key element to the IT Programme, and will be addressed through the sharing of technology, infrastructure and solutions across government and non-government organisations and within the design, development, construction and delivery aspects of the ODA programme.

3.1 IT management structure

The IT organisation is structured to deliver change through the lifecycle, from initiation, project delivery, to ongoing operations.

The structure for the delivery of the IT programme is:

Design Authority:	The purpose of the design authority is to provide the IT strategy, architecture and design solutions that are fit for purpose and consistent across the IT landscape.
Project Portfolio:	The purpose of the project delivery programme is to manage and deliver IT projects through the IT project lifecycle.
Service Delivery:	The purpose of the Service Delivery programme is to manage and deliver all IT Services to the London 2012 programme.
Programme Management Office:	The purpose of the PMO is to provide the support, processes, procedures, reporting and controls to enable the project delivery teams to operate efficiently and comply with the governance requirements.

To supplement the skills and staff that are employed or contracted directly to the ODA partner organisations are used. In addition to the key partners, other organisations are utilised to provide specific technology resources, where required.

3.2 Roles and responsibilities

The IT programme has established an agreed governance structure with clear escalation routes and communication channels. In addition the IT programme complies with ODA's Programme Assurance Office (PAO) submittals process.

The IT governance framework consists of:

- investment approval;
- board approval, escalation and reporting structure;
- project lifecycle;
- benefits realisation;
- assurance;
- internal and external audits;
- project management disciplines; and
- communications.

The governance for projects and service management is set out below:

- The Business Systems Change Board (BSCB) incorporates executives from both CLM and ODA, and is the primary decision making authority over the IT programme. It is chaired by ODA's Head of Finance. The BSCB has responsibility for the approval of the business case and any subsequent investment.

- The IT Programme Steering Board (IT PSB) governs from a programme wide technology and project delivery perspective. This Board is chaired by the ODA IT Sponsor.
- The Project Boards and Sub-programme Boards govern the individual projects/programmes and are business led.
- The Service Delivery Change Advisory Board (CAB) coordinates the release of change into the production environments. It is chaired by the Service Transition Manager.
- The Joint IT Service Management Group governs the production of IT Services, provided to the London 2012 organisations, and is chaired by the Head of Service Delivery.
- Technology User Groups, which govern shared technology areas.
- IT Security Board, which is an ODA Security board, in which the IT Programme is a key contributor.

All projects follow a standard lifecycle model which is integrated into the governance structure. It incorporates a set of approvals gates, with artefacts agreed with the PAO, and aligns with OGC's Managing Successful Programmes (MSP) framework. All submittal documents will require approval by the ODA IT Sponsor team and agreed business stakeholders.

A project is instituted and then goes through a series of six stages, as set out in the table below.

Stage	Responsibility
0. Initiation	Business User
1. Strategic Feasibility	Design Authority
2. Feasibility	Design Authority
3. Planning and Design	Project Team
4. Development build and test	Project Team
5. Implement	Service Delivery
6. Review	Design Authority

The distribution of responsibilities is shared by a range of parties throughout this process. Starting with the business user, this is then supported by the Capability Manager who, with assistance from the IT Design Authority, is responsible for strategic and system feasibility.

The project team are responsible for planning and design, development and testing through to service delivery, who implement the project, and finally with the Capability Manager and IT sponsor team undertaking a project review. Each stage of the process is in effect a checking process to enable progress on to the next stage.

All projects and services will undergo a benefits realisation review on a regular basis. This will be performed by the ODA IT sponsor team, and the IT Design Authority, in

conjunction with stakeholders and external benchmarking organisations like Gartner. This review will examine the integration with the business programme, through successful business change, training, change management and the realisation of the benefits.

The ODA IT sponsor team monitor adherence to the process, and the quality status of projects, in line with the integrated assurance management approach.

The Capability Manager provides a gate keeping role at each stage of the project life cycle, which is a key assurance role. This includes gathering the project requirements from the Project Sponsors to produce the PID through to the benefits realisation analysis and reporting at the review stage of the project.

4 ODA E&I policy commitment and strategy

4.1 ODA Integrated Equality Scheme 2009

The ODA has made strong commitment to equality and inclusion. These have been set out in their Integrated Equality Scheme, 2009, which itself, built upon the ODA's 2007 Equality and Inclusion Strategy. Full details of both policies are set out in the London 2012 website¹. The key elements of this commitment to E&I in particular with respect to this EqIA are to deliver the vision of the Games and to ensure that:

- The commitment to equality and inclusion is focused on the key issues of inclusive design, employment opportunities, business opportunities, targeted community engagement, integration and capability.
- The ODA seeks to build equality and inclusion into the ordinary business processes; this helps to make sure the ODA not only meets its statutory equality duties but also develops its agenda beyond minimal legal compliance.

4.2 Focus of this EqIA

The key focus of this EqIA, is to assess the effectiveness of the IT programme in delivering the E&I commitment of the ODA, and in addressing the needs of all those using the IT systems. On a practical level most of the specific lines of inquiry have been developed to ensure that the ODA is able to secure its commitment to E&I, as well as to ensure that the organisation itself has the capacity to fulfil this commitment.

E&I is not simply an ODA programme wide commitment, it is also something that is meaningful to staff and partners using systems in the organisation, key issues of accessibility clearly need to be addressed. Moreover, staff need to have the understanding and the capacity to address E&I effectively, in their workplace and in their work. E&I is not simply an issue for HR, but one for all parts of the ODA.

It is also critical that the key E&I policy commitments of the ODA are assessed in the context of the IT programme, and to this end the EqIA Grid in section 8 identifies the following sub-sections:

- inclusive design;
- employment opportunities;
- business opportunities;
- targeted community engagement; and
- integration and capability

It is supplemented with the following additional section

- IT governance;
- IT standards; and
- specific projects.

¹ www.london2012com/equality

5 Key project areas in the ODA IT programme

5.1 Key project areas

The ODA seeks to deliver solutions and services that support the IT principles which are:

- value for money;
- high quality, reliable and secure;
- provide a lasting legacy; and
- manage information efficiently and effectively.

The IT Programme contributes to the success of the ODA programme, through delivering a defined set of IT services. End-user training and business process change is not included within the IT programme scope or budgets.

The following table identifies the services, and some of the potential headline equality and inclusion considerations which the IT programme should seek to address when sourcing IT solutions for these services. In some cases this work is already being addressed.

IT Services	Equality and inclusion considerations
Telephony	Minicomms or speech to text software available as standard. Accessible phone screens. Accessible mobiles, Blackberries. Remote access to messages.
Hosting and Server Management Desktop	On accessible platforms, compatible with screen readers / text to speech.
Print management	Accessible formats and design.
Network	Remote working capability.
Network access	Remote, accessible formats. Remote working capability.
Service desk	Available during flexible timings, promoting flexible working for staff and better access for users. Service level agreements for non-standard equipment requests, in alignment with standard equipment requests. Support provided for non-standard equipment. Staff trained in advising and sourcing reasonable adjustment solutions.

IT Services	Equality and inclusion considerations
<ul style="list-style-type: none"> – Email – Onboarding – HR Applications – Design Applications – Logistics Applications – Programme Controls – Document Management Applications – Contract Administration Applications – Document Control Applications – CRM Applications – Portal and Process Content – Access Control Applications 	<p>On remote, accessible platforms, compatible with screen readers / text to speech. This would also include the need to ensure that the support material for internal staff is set out in plain, clear and accessible language.</p>
<p>Geospatial Applications</p>	<p>On remote, accessible platforms, compatible with screen readers / text to speech. Equality and inclusion demographic data cross-referenced against projects to measure benefits realisation at project review stage.</p>
<p>Software Licenses</p>	<p>Scope to extend these in legacy to allow suppliers to develop their internal capacity and supply chain capacity further. Allow suppliers to use the applications in future to promote sustainability in capacity building for future projects and demonstrate capability to evidence future procurement activity.</p>
<p>Information Security Capability Information Security Policy</p>	<p>On remote, accessible platforms, compatible with screen readers / text to speech. Ensure system is not applied disproportionately and has adverse impacts for any equality groups.</p>
<p>Performance Management (KPI`s)</p>	<p>On remote, accessible platforms, compatible with screen readers / text to speech. Ensure equality and inclusion measures are embedded, measured and analysed across all relevant, people based KPI areas.</p>

These services, and their E&I considerations, demonstrate a potentially high level of commitment required to address the E&I priority theme. Part of the EqIA will seek to address the extent to which these commitments are being addressed, and where potential changes can be made, to enhance these commitments, and to further safeguard the delivery of equality and inclusion, through the IT programme.

6 Key E&I issues

6.1 Employment

The majority of staff work for ATOS and are recruited through a pre-existing talent pool that they manage. It is not clear that any E&I monitoring of this pool takes place, and if not, then measures need to be taken to initiate monitoring in line with ODA recruitment policy of monitoring across disability, gender age and race as a minimum. This is enable an understanding of what the current situation is, and to decide if any remedial action is required.

There is a lack of clarity around the requirements for the delivery of E&I by IT staff, which could be addressed through training. This is particularly relevant for Capability Managers, who play a key role within the current commissioning and procurement processes. It should be noted that all Capability Managers should have had access to E&I specific procurement training.

6.2 Business opportunities

Effort has been made in relation to the tendering process, however it is not clear that BAME, women and disabled people-owned businesses have benefited from the opportunities created within the supply chain, as is the ODA stated aim.

This may be difficult to achieve, due to the type nature and scope of the opportunities available i.e. the fact that there is a pre-agreed provider for a proportion of the services and/or staffing and the fact that the sector is not made up of a representative cross section of BAME, women- and disabled -owned businesses operating in the supply chain.

6.3 Equipment

There are clear targets and service standards set for standard equipment needs. However, there are no targets or service level agreements set for the delivery of equipment required to make 'reasonable adjustments'. These additional standards need to be developed to ensure delivery of the ODA Reasonable Adjustment policy. This should include providing staff with information about the standard catalogue of 'off the shelf' equipment that the ODA can supply, in line with other standard equipment solutions.

6.4 Communications

There is a lack of clarity as to how E&I impacts on the IT programme in a wider sense. There is a high degree of commitment, but in general people felt unclear about the way the IT function can meet the ODA's specific priorities for E&I in this area. One example raised was the application of consistent accessibility standards in the IT programme.

In terms of print, design, formatting etc the ODA has accessibility standards that have been developed by the Communications Team. Moreover, the Communications Team have been asking for the accessibility standards to be applied across the ODA. Interviews with staff would suggest the need to more effectively interpret these accessibility standards, as they would apply to the IT programme. This is critical as the ODA needs the assurance that there is an integrated and consistent approach to accessibility.

6.5 Integration of capability

Integration of capabilities is a commitment of the ODA. In the area of equality and inclusion, the integration of capabilities has meant that the ODA has been keen to ensure that contractors build their E&I capacity, to meet the standards expected by the ODA. The key focus of integration of capabilities has been focusing on statutory commitment to E&I, especially in the area of HR policy, selection and recruitment, workforce monitoring, flexible working, reasonable adjustments and tackling discrimination.

In addition to the statutory E&I requirements, supplier diversity is also a priority, especially where this approach can influence the subcontracting of Tier one suppliers through their supply chains.

Both Fujitsu and Athos have developed E&I plans which have begun to address employment, service delivery, supply chain management, community engagement and in some cases technical E&I issues.

6.6 Inclusive design

In terms of the IT programme, and the end products, this relates in the main to access and accessibility. However there is a low awareness that national and international IT standards exist. The systems and processes utilised by the IT programme are designed and operated with these standards in mind. To improve the use of IT standards in future projects the six step project process should include questions about accessibility. It would also be beneficial for web based solutions to include, as part of the project costs, an ongoing web site monitoring service to ensure that the highest possible standards are met.

It is not inconceivable that in time translations, or the ability to translate, may also become more relevant as the ODA moves closer to Games mode. This is likely not to have such impact on the ODA IT programme, but rather the realisation that the systems end users may become more reflective of the diversity of those who will be working on or attending the Games. It should be noted that this is likely to be an issue for LOGOC rather than the ODA.

6.7 Community engagement

The opportunities for community engagement lie predominately with the legacy stage of the project. Although there might be chances to conceivably achieve some of these aims by engaging with schools colleges and the voluntary sector through design

competitions amongst other initiatives. In order to involve the community during the legacy stage the planning needs to start now.

These E&I priorities are relevant to the IT programme, in differing levels and degrees. Clearly some of the E&I issues have greater levels of impact; nonetheless all these have been taken into account and are to be used to set the context for this EqIA.

7 Impact Assessment

7.1 Methodology

The core focus of the methodology for this Equality impact Assessment has been:

- initial scoping meetings with ODA staff;
- extensive desktop research, analysing all relevant existing IT programme documentation, IT documentation currently in draft, ODA E&I policies and the design and formatting guidelines;
- a series of face to face interviews with key IT heads of service and representatives from IT operational delivery from across the IT programme (ODA, CLM, Atos Origin), Equality and Inclusion and the Programme Assurance Office; and
- telephone interviews and on site research of SharePoint documents.

7.2 Desk research

The following documents were reviewed as part of this EqIA:

- London 2012 IT Strategy;
- London 2012 IT Operating Plan;
- London 2012 Enterprise Architecture and Standards;
- CLM IT Strategy 2008;
- London 2012 Design Authority CSharp Coding Standards;
- CLM Technology Item Register;
- Atos Origin 2012 Equality Action Plan;
- 2012 Remote Access user guide;
- London 2012 IT Service Catalogue; and
- Specific ODA HR policies including:
 - communications policy;
 - E-Mail and internet;
 - flexible working procedures;
 - IT new user form;
 - mobile phones;
 - personal data and DPA;
 - reasonable adjustments procedure; and
 - security checks policy.

7.3 Interviews

A series of structured, one hour interviews and telephone interviews were conducted with the following members of staff:

- Interview 1: CLM IT Capability Manager
- Interview 2: ODA IT Capability Manager
- Interview 3: ODA Sponsor Team
- Interview 4: CLM, Head of Programme Team
- Interview 5: ATOS Origin
- Interview 6: ODA Sponsor- Chief Enterprise Architect
- Interview 7: PAO
- Interview 8: PMO
- Interview 9: Design Authority

The interview structure consisted of an overview of EqIAs, their purpose, aim and legal context, followed by an insight of why we were conducting an IT Programme EqIA. The interviewee was then asked to give an overview of their project areas. This was then followed, where relevant and appropriate, with some or all of the following lines of enquiry:

7.3.1 Current position on E&I

Questions asked with regard to current E&I position:

- Please give an outline of the project areas your team are responsible for.
- What is the relationship with the other modes e.g. ODA / CLM / suppliers?
- What are the overall E&I requirements for these / this project? How were they identified?
- How is the delivery of these co-ordinated? i.e. how is the requirement integrated into the project?
- How is the impact in the short and long term measured and monitored?

7.3.2 EqIA impact evaluation

Questions asked with regard to EqIA impact evaluation:

- Briefly outline what the user community is for this project / solution / approach:
- Establish what equality target groups are current or potential users in particular disabled people and women's groups.
 - Does the project / solution / approach (both on and off the shelf) adapt itself to meet the needs of these users? Prompt - remote working, accessible system / service design, modification to text to speech, visual aids (e.g. Jaws).
 - How and who assures that the solutions sourced meet these requirements? Who specifies these? Prompt – is this a sponsor specification, specific to projects and tested at procurement as a technical question or an IT standard that is applied for all solutions?

- What is the size of the recruitment opportunity both at tier 1 and supply chain?
- What mechanisms are in place to attract and recruit staff for trainee / apprenticeship / secondment from a diverse applicant pool?
 - How do you ensure that the E&I requirements are met down the supply chain? Prompt – how is capacity building and integration realised and monitored at local supplier level? e.g. workforce monitoring.
- Where suppliers have adopted integrated ODA systems what is the potential for them to retain stand alone licenses and systems to allow capacity building and further opportunities to compete for contracts?
- What level of E&I training have you and your team received? Prompt – general training, specific training e.g. supplier diversity

The key points, notes, issues and observations were recorded. The key findings of these interviews were then summarised in Section 8 - Impact Assessment Grids.

8 Equality impact assessment grids

The interviews, which were conducted to inform this EqIA, assisted in identifying and evidencing potential positive or negative impacts, which assist in supporting the overall key findings. The following grids are structured against emerging themes, which were identified during the interviews. Where potential negative impacts have been identified, recommendations have been made to minimise or eliminate the impact. These grids will inform the final recommendations and action plan.

Governance Impacts identified (potentially negative unless stated as positive)	Mitigating actions
Issue – IT Strategy has been live since April 2008. It has a strong E&I theme in terms of value, purpose and benefit. However the document is not widely distributed or embedded amongst the IT community which potentially has a low awareness of the E&I requirements and their E&I responsibilities against these.	Recommend – IT Strategy has been replaced by the IT Operating Plan which may need to be reviewed from an E&I perspective and possibly updated to ensure accuracy and re-issued with briefing note and/or key messages from Programme Head.
Issue – IT guide is currently in draft and will include a section on building legacy case in the business cases in more detail. It is critical for E&I to be strongly represented in this to strengthen its case and to ensure that the ODA’s E&I aims are met.	Recommend – ODA E&I team to work with Capability Managers to develop a robust E&I section in the IT guide.
Issue – The IT business case template does not have an EqIA template or section; so E&I issues are currently not specifically considered or addressed at each stage of the development of the business case. This is likely to have a direct impact on the final IT solution.	Recommend – discuss and agree with Programme Assurance Office, a set of E&I considerations to be incorporated into the Outline Business Case Template, to be applied to each project. E&I Manager to agree and sign off for this section. Incorporate a set of assurance criteria at each of the 6 stages of the project cycle, to ensure actions are developed throughout the project cycle.

Integration and capability Impacts identified (positive and negative)	Mitigating actions
<p>Issue – LOCOG own the ‘Knowledge’ intranet and London 2012 website. Both sites have been recently reviewed by AbilityNet and revised to incorporate the recommendations. ODA communications manage the content of the ODA pages on the website and the whole content of the ‘Knowledge’. It is important that continued review and management of the sites includes checks for accessibility and inclusion. A formal review structure needs to be in place to ensure a systematic approach to effective web accessibility.</p>	<p>Recommend - Establish a protocol for ensuring that all web content is accessible. Develop systems that are conforming to the national recognised standards of web accessibility.</p>

Capacity building internally Impacts identified (positive and negative)	Mitigating actions
<p>Issue – Capability Managers are project gatekeepers at each stage of the project. They can advise, assure and champion the E&I requirement at each stage of the 6 stage project lifecycle. Capability Managers have a different background and varying levels of E&I experience but are critical to assuring and evaluating the measures on E&I.</p>	<p>Recommend – Capability Managers need to have high level of expertise and guidance to make E&I recommendations to the project sponsor and project manager at project initiation stage and assign ownership. This could be supported both by more robust processes (templates etc) and via training.</p>
<p>Issue – IT is a specialist area which requires additional content within E&I training. Staff not aware of their organisational and individual responsibilities which has a direct impact on the delivery of the IT programme.</p>	<p>Recommend – Provide E&I training / briefings for IT staff. This is particularly relevant for Capability Managers who own the commissioning process.</p>

IT Standards Impacts identified (positive and negative)	Mitigating actions
<p>Issue – The ODA has IT design standards and E&I commitments to accessibility. These commitments are defined in some standards of practice for user interface, reasonable adjustments, visual and audio accessibility and web / intranet design. However there is low awareness of these E&I IT commitments, and in some cases these standards of practice are ad hoc and not set across all the IT programme. There is a potential risk of inconsistency and or the possibility that there could be a failure to apply the standards which will affect the E&I impacts of specific projects.</p>	<p>Recommend - Review of existing design standards for E&I and ensure their consistency of application.</p> <p>Promote the use of these standards and in so doing review level of understanding of E&I issues in IT as part of training needs analysis of key staff.</p> <p>Provide training or briefings as required to meet the need which could include coaching sessions, 1-2-1s, briefing sessions, formal training, local champions, e-learning or workshops.</p>
<p>Issue – Monitoring of projects at each stage at on completion of the project life cycle, comprises of a review of time, against budget, and the benefits that have been realised through the project. Currently there is no standard E&I element within the benefits section of this monitoring exercise, so the ODA IT programme managers cannot establish if positive impacts were realised for equality groups.</p>	<p>Recommend – Introduce an E&I review element within the project monitoring process to ensure that the E&I requirements and benefits realisation are systematically monitored, reviewed and positive impacts promoted.</p>
<p>Issue – The ODA IT programme needs to set standards for accessibility in the IT programme. Time and budgets can cause clear constraints on the effectiveness of accessibility solutions. However the ODA does have an E&I Team which can offer expertise and knowledge on E&I issues. Joint working between the IT programme and E&I Team could be better harnessed to secure affordable and innovative solutions.</p>	<p>Recommend – Develop and share in-house expertise and experience to ensure cost effective and manageable E&I interventions.</p>

IT Standards Impacts identified (positive and negative)	Mitigating actions
<p>Issue –Acquiring off the shelf solutions is a key IT strategy commitment, although this may reduce the level of accessibility to specific systems. The policy of purchasing off the shelf solutions, whilst having a strong business case, may cause the IT programme to fail to address the key E&I issue of accessibility. The ODA has previously been successful using the Business Intelligence Framework platform to develop bespoke solutions which has had the benefit of ensuring greater accessibility.</p>	<p>Recommend – ODA to use BIF Solutions where they are specifically needed and to check this process through the Business Case template.</p>
<p>Issue – Previously there was an IT Assurance member of staff who used to be responsible for E&I components of projects. However this post was not replaced. This has resulted in the potential impact that individual project sponsors are not explicitly identifying and assuring the E&I requirement.</p>	<p>Recommend – To establish where the responsibility for the E&I elements of IT projects should be located. To define the requirements of this work including scope and accountabilities To define in which instances this would need to be delivered.</p>
<p>Issue – Key elements of the IT programme require a level of E&I checking both in terms of design and delivery, these include:</p> <ul style="list-style-type: none"> • Web and Intranet based solutions • IT Assurance • Reasonable adjustments via non standard IT equipment 	<p>Recommend – the completion of:</p> <ul style="list-style-type: none"> • website and intranet accessibility audits and ongoing monitoring • IT Assurance completed by Capability Managers • Information Management to address reasonable adjustments and produce an IT Accessibility Catalogue and provide links to the information along with the standard IT equipment catalogue.

Inclusive design Impacts identified (positive and negative)	Mitigating actions
<p>Issue – Inclusive Design is critical to the IT programme. Many of the issues raised throughout this section are about Inclusive Design. To this end there needs to be more effective levels of consistency and delivery of inclusion throughout the IT programme.</p> <p>The establishment of core accessibility standards and effective monitoring is critical. Inclusive design also reaches beyond the Disability Discrimination Act 1995, 2005 and access standards; it also includes good elements of service design and addresses other barriers faced by other equality strands. The E&I elements of project templates should test the inclusivity of design in line with the ODAs commitment to E&I as a priority theme delivered by all ODA programmes.</p>	<p>Recommend - Develop sections of the project business case template to address inclusive design. Ensuring cross equality strand assurances and safeguards.</p>

Business opportunities: Supply chain Impacts identified (positive and negative)	Mitigating actions
<p>Issue – E&I specific requirements are not always not tested at the procurement of IT solutions. Supplier capacities to meet statutory public authority requirements are tested but there are no technical tests of the solution in relation to E&I. This is a potential gap specific to each IT project e.g. the design solution needs to meet E&I requirements like accessibility.</p>	<p>Recommend - Ensure any project specific E&I requirements are technically tested against solutions at ITT procurement stage in addition to satisfying the standard statutory requirements.</p> <p>Importantly this should also apply to Framework Agreements and should be picked up in the Project feasibility cycle and hence potentially a responsibility for a Capability Manager</p>
<p>Issue –Legacy costs should be calculated at Outline Business Case stage hence establishing what infrastructure could be lost going forward. This infrastructure is likely to include licenses and applications that support E&I monitoring of supplier diversity, workforce management and procurement. These systems also include other ODA priority themes like sustainability, health and safety and security. This has allowed Tier 1 suppliers and their supply chains to develop their capacity and to effectively integrate with the ODA’s policy positions. This has been a success of the overall programme and efforts need to be made to secure these business integration gains.</p>	<p>Recommend – Review the benefits of enabling Tier One suppliers to have effective use of these systems and applications this could be picked up through a future IT project to review the legacy issues separately.</p>

Employment within IT Impacts identified (positive and negative)	Mitigating actions
Issue – All recruitment for Atos is carried out via the established Atos recruitment pool. No open recruitment unless candidates are already in the established pool.	Recommend – Establish the potential for Atos to expand the recruitment pool by engaging with the local IT labour market.
Issue – Where recruitment does take place it is not clear from the Atos E&I action plan if they are fulfilling the ODA’s recruitment target to have a workforce that reflects the community.	Recommend – Where recruitment takes place Atos to monitor in line with ODA’s policy including collecting information about peoples home location.

Positive impacts Impacts identified (positive)	Mitigating actions
There is currently Remote Access for ODA Staff This is an example of how the ODA encourages flexible working and is an Employer of Choice.	

Project specific	Impacts identified (positive and negative)	Mitigating actions
EDRMS – Electronic Data Records Management System	Issue –The Capability Manager has stated that they are unaware of the E&I standards for this project and hence have not challenged this.	Recommend – All Capability Managers are given a briefing session on E&I project requirements and their role in ensuring delivery of these.
EDRMS – Electronic Data Records Management System	Issue – all stakeholders and Tier 1s can currently access EDRMS via a web portal. Potentially this system can promote E&I shared learning and could be used a key resource.	Recommend – Publish E&I documents to improve E&I capability for all audiences.

Project specific	Impacts identified (positive and negative)	Mitigating actions
EDRMS – Electronic Data Records Management System	<p>Positive – The Capability Manager is keen to do a project EqIA for EDRMS.</p> <p>System can focus on legacy potential of record sharing for local libraries, schools, community groups.</p> <p>This is a positive community impact and increases a sense of ownership of 2012</p>	<p>Recommend – EqIA to be undertaken by EDRMS Capability Manager.</p>
EDRMS – Electronic Data Records Management System	<p>Issue – E&I review needs to be built into the benefits realisation phase, part of project closure, to enable benefits review for E&I. The Project Sponsor currently addresses benefit realisations generally and it would help if some level of specific E&I review of benefits is designed.</p>	<p>Recommend – Brief all Project Sponsors to ensure they are aware of what measures, benefits realisation on E&I should be based on and build into standard template.</p>
<p>Environment and Sustainability Data collection from Tier 1 Suppliers. Environment and Sustainability data will be collected via a web portal. Not live system yet. Data comes to ODA.</p>	<p>Issue – Different licensing and hosting platform options for data collection systems will have impact on Tier 1s developing or demonstrating capacity building in legacy e.g. Environment and Sustainability Tier 1 licenses possibly expire in September 2012.</p>	<p>Recommend – when reviewing licence options look at legacy impacts vs costs. Also conduct Tier 1 review of whether they will continue to use ODA systems or will develop their own. This recommendation could be applied across all the ODA Priority Themes including E&I.</p>
Environment and Sustainability	<p>Issue – Environment and Sustainability KPI data will be collected from the supplier, with few options for supplier to self-report and develop their own capacity and knowledge and or that of their supply chain.</p>	<p>Recommend – Consider the local reporting by Tier 1 suppliers where possible.</p>
Geospatial Information System	<p>Issue - Socio-economic data is not currently uploaded into GIS so the GIS team can't</p>	<p>Recommend – to ensure that socio-economic data is uploaded on to the GIS system and</p>

Project specific	Impacts identified (positive and negative)	Mitigating actions
(GIS)	explicitly analyse where impacts (including E&I) have been made. Not difficult to upload data into GIS but no organisational driver. This is potentially missing a significant opportunity to address the wider E&I impacts of the ODA and 2012.	promote its usage throughout the organisation.
Business Intelligent Framework (BIF)	Positive - platform allows all bespoke packages to be developed and tested for accessibility approved layouts and minimum screen resolutions. BIF follows technology methodology guidelines, approved templates and prescribed standards.	Recommend – this process is positive but will only continue to be so if indeed all packages are tested for accessibility,

9 Recommendations

A series of recommendations have been suggested in the Equality Impact Assessment Grid. This section seeks to review these recommendations, and prioritise those that are most likely to make an impact and to address potential concerns. From the grid it is clear that many elements of E&I have already been considered and established within the IT programme.

E&I is a feature of the work of IT, and has perhaps the most significant impact in the area of reasonable adjustments and flexible working. However, the assessment has shown that the delivery of the programme with regard to E&I is relatively inconsistent, and some processes have had more E&I focus than others. In most cases the approach to E&I has been proportionate. However there are some areas where improvements can still be made. This is partly to secure more consistency, but it also addresses the establishment of core standards to secure E&I and to support inclusivity.

The recommendations set out below are set against the core E&I priorities of the ODA, and have been prioritised to ensure the greatest impact and capacity to resolve or mitigate inconsistency, and in some cases negative impact. In some cases they simply seek to sustain good practice and to enhance positive E&I outcomes of this work.

9.1 Specific recommendations

It is evident throughout this EqIA that the ODA IT programme will need to:

1. Draft clear E&I standards within the programme, in order to mainstream good equality and inclusion practice, and to set clear performance standards. This would include:
 - standards for reasonable adjustment for IT provision;
 - minimum design standards to address equality and inclusion, both within the project lifecycle and also in the monitoring and evaluation of systems; and
 - minimum accessibility standards for systems and their use.

Both these latter two elements should also address the currently agreed accessibility standards of the organisation, in particular with respect to design and print and communications.

2. Define the roles and responsibility for the governance and review of equality and inclusion within the IT Programme. There needs to be clear equality and inclusion roles defined for key parts of the IT programme. It is recommended that the leadership role to oversee the E&I components of the development of all new IT services should rest with the Design Authority. It is also recommended that the safeguarding of the E&I commitment through the project life cycle should be delivered by the Capability Managers.

3. Develop specific IT systems templates to reflect the ODA equality and inclusion commitments. It is recommended that the project business case should include a specific equality and inclusion check list or template. This would replace and indeed simplify the EqIA process for each new project. Additionally, it is recommended that a set of equality and inclusion considerations are included within the benefits realisation assessment and monitoring of completed projects.
4. Maintain a programme of reasonable adjustments, remote access, flexible working, accessibility requirements including fonts and formats and access and inclusion within design standards. It is critical that staff know how to access the IT equipment provided to accommodate the ODAs reasonable adjustment policy.
5. Ensure that key staff, within the IT programme, undertake targeted E&I training, to address their specific areas of responsibility, and to build capacity. This training would supplement corporate equality and inclusion training, but be specific to the needs and the delivery of IT programme.
6. Work with Atos and Fujitsu, to complete equality and inclusion action plans which specifically address the aforementioned equality and inclusion standards for IT. To this end, these E&I action plans will need to be wider documents, incorporating service delivery and technological focus for E&I, as well as statutory employment actions.
7. Consider the wider access to core systems information, and data collected by the ODA, to ensure that good practice is shared and that organisations, such as the GLA, LDA and key local, regional and national bodies can learn from the work of the ODA, especially in the area of E&I.

10 Action plan

The action plan below sets out the key recommendations of this EqIA, and provides a series of key actions and their deadline and delivery responsibilities.

Recommendations	Action	Responsible team	Review date / delivery date
Draft clear E&I Standards within the IT programme, in order to mainstream good equality and inclusion practice, and to set clear performance standards.	Develop standards for the provision of IT equipment to ensure delivery of the ODA Reasonable Adjustment Policy. Minimum design standards to address equality and inclusion both within the project lifecycle and in the monitoring and evaluation of systems Minimum accessibility standards for systems and their use.	ODA IT Sponsor Team	
Define the roles and responsibility for the governance, and review of equality and inclusion within the IT Programme.	Design Authority to undertake the leadership role to oversee the E&I components of the development of all new IT services. Capability Managers to safeguard the E&I commitment through the project life cycle.	Design Authority ODA IT Sponsor Team	
Develop specific IT systems, templates to deliver the ODA equality and inclusion commitments.	Draft specific equality and inclusion checklists or templates as part of the project business case. Draft equality and inclusion considerations, as part of the benefits realisation assessment and monitoring of completed projects.	ODA IT Sponsor Team	

Recommendations	Action	Responsible team	Review date / delivery date
Maintain the organisation's programme of reasonable adjustments, remote access, flexible working, accessibility requirements including the use of standard fonts and formats; access and inclusion within design standards	<p>Ensure that staff are aware of how to access the IT catalogue which supports the ODA Reasonable Adjustments Policy.</p> <p>Ensure that staff are aware of the full range of specific access opportunities being provided.</p>	All – Service Delivery Team	
Ensure that key staff, within the IT programme attend targeted E&I training to address their specific areas of responsibility, and to build capacity.	<p>Establish learning priorities for each staff group.</p> <p>Align training/workshops with the equality and inclusion standards in IT.</p>	ODA IT Sponsor Team	
Improve Integration and capabilities of Tier One contractors.	<p>Work with Tier One contractors (Atos and Fujitsu) to complete equality and inclusion action plans that specifically address the aforementioned equality and inclusion standards for IT.</p> <p>Expand E&I action plans to incorporate service delivery and technological focus for E&I as well as statutory employment actions.</p>	<p>ODA IT Sponsor Team</p> <p>Atos</p> <p>Fujitsu</p>	
Consider the wider access to core systems information and data collected by the ODA, to be shared with local communities and learning organisations.	Ensure that good practice is shared, and that organisations can learn from the work of the ODA IT programme, especially in relation to the delivery of the E&I objectives.	ODA IT Sponsor Team	