

Equality, diversity and inclusion (EDI) considerations for Pandemic Incident Management

Report of Jo Hooper, Corporate Equality Officer, Devon County Council

Under the Equality Act 2010, public authorities must pay attention to the rights of people in relation to their protected characteristics in all that we do, all of the time.

These rights include the ability to access information and eligible services on an equal basis and to have reasonable adjustments made to cater for a disability.

A duty to 'foster good community relations' between diverse groups also applies and means we have a role in reducing or not causing community tensions. The duty to 'advance equality' requires us to be pro-active in reducing inequalities.

Everyone has the protected characteristics of age, gender/sex, sexual orientation, race/ethnicity and religion/belief although certain diversity groups within these characteristics experience more disadvantage than others – typically women and minorities. Disabled people, pregnant and breastfeeding women/new mothers and transgender people are also protected groups.

It's important that we are not over-confident in our approach - by assuming that because we are focussing on 'vulnerable people' that we are addressing EDI issues by default. The effects of the international response to coronavirus will affect people differently and increase issues for those who are already disadvantaged in other ways (intersectionality).

We also need to be very aware of our own unconscious bias (which can lead to wrong assumptions being made). Bias is more likely to occur when we make fast decisions. It's important to slow down thinking where possible and invite others to challenge/question to test assumptions. This benefits decision making across the board, not just EDI.

Following the principles below will help us ensure that EDI issues are not over-looked.

We all need to be:

Compassionate this means...showing kindness and understanding; showing that you are thinking about people (this may also include a focus

on certain groups of people); *empowering* people to cope with change.

Inclusive this means...thinking about all the different diversity groups (and their intersectionality), it also means listening to people who are not in your 'in group' as they may have useful ideas and insight to share. People from different disciplines can look at things in new ways.

Flexible this means...adapting to change quickly and positively, and thinking about how to do things in different ways.

Consistent and clear this means...using plain English - simple and direct language - and being consistent with messages by 'sticking to the script' exactly. If the message needs to change due to circumstances, explain the reasons for the change.

The Equality and Human Rights Commission (EHRC) published its letter to the Prime Minister on 20th March with a similar message:

"COVID-19 does not discriminate, but it does impact people differently. The priority remains those who are directly most seriously affected, more likely to be older people and those with underlying health conditions, and the people who care for them – whether that is their loved ones or our dedicated health and social care professionals. The restrictions being extended by today's emergency coronavirus legislation are designed to protect those in vulnerable situations and safeguard our future. They have significant implications for all of us, but as they come into effect it will be important to consider carefully the specific impacts they may have on groups who are already disadvantaged in other ways. We must ensure they are not left further behind". Relevant risks/impacts identified by the commission have been added to the table below and marked 'EHRC'.

Below are potential equality risks and impacts. Local (Devon) people in the voluntary/community sector, translation/interpreting agencies and public service equality leads have been contacted to provide insight. This document remains a work in progress.

Glossary:

BAME:	Black, Asian and Minority Ethnic people. Everyone who is not White British.
GRT:	Gypsies and Travellers (also come under BAME).
LGBT:	Lesbian, Gay, Bisexual and Transgender people including those who are non-binary gender identity.
Intersectionality:	a combination of diversity characteristics. For example, a person who identifies as BAME and Transgender.
Neurodiversity:	autistic people, ADHD etc. (not the same as learning disability).
BSL:	British Sign Language
EDI:	Equality, diversity and inclusion
DVA:	Domestic violence and abuse
SEN:	Special Educational Needs
DCC:	Devon County Council

Equality Risks and Impacts

Version 2: 25th March 2020

Diversity group	Issue (potential or actual)	Mitigating action (suggested)
Deaf people	<p>Limited understanding of English; require information in BSL.</p> <p>Very little information about coronavirus has been made available/promoted in BSL.</p> <p>There are a significant minority (usually in the older age groups) who are not digitally savvy and need face to face visits.</p> <p>SMS texting is a popular means of communicating for many (but not all).</p>	<p>Provide important information in BSL video. Other information can be provided in Easy Read.</p> <ul style="list-style-type: none">• Easy Read is also acceptable but BSL should be made available where this could be considered a 'reasonable adjustment'.• Provide BSL interpreter 'in vision' signing as part of important spoken word video/TV. Subtitles are NOT accessible to Deaf people.• Ensure staff/volunteers have basic BSL skills and know how to access a remote video interpreting service if they are likely to come into contact with Deaf people (for example, if dropping off supplies to home of Deaf resident as part of targeted support for people who are shielding).• Provide BSL video versions for key information on websites. Alternatively, allow Deaf people to access the remote video interpreting service (via a link on the webpage) in order to have key information about the pandemic from the website translated where this isn't already provided in BSL video (it is probably more cost effective to produce BSL video translation for static information if there is demand).

- Include options for SMS contact to helplines etc.
- Recognise that for some, face to face visiting is the only option. (Find out who these people are).

PHE campaign resources in BSL:

<https://campaignresources.phe.gov.uk/resources/campaigns/101/resources/5080>

BSL users can talk to NHS111 using the [InterpreterNOW](#) app (registration is required). They can also connect via a [PC or laptop](#).

DCC provision:

DCC has a contract with Sign Solutions for BSL interpreting.

Remote video interpreting is provided via Sign Solutions ['InterpretersLive' 24/7 Video Service](#) (a BSL version of telephone interpreting service). You can contact a BSL interpreter via Skype video on a smart phone or laptop.

Note that demand may be high and interpreters may need to be booked in advance. (Sign Solutions have been notified of potential increase during Targeted Support).

Also note that demand for internet use is making systems slow and could affect video interpreting quality.

DCC Information on providing alternative formats and interpreting (including foreign language and Easy Read) is

		<p>available at:</p> <p>https://inside.devon.gov.uk/task/providing-alternative-formats-and-communication-support/</p> <p>Training:</p> <p>Deaf Awareness e-learning is also available on DEL (DCC learning and development portal). Links to online BSL courses and basic BSL skills is available in the Resources section of the course.</p> <p>Voluntary sector:</p> <p>Alongside DCC Sensory Team, Living Options Devon Deaf project can assist with reaching out to Deaf community.</p>
<p>Learning disability or limited English language</p>	<p>Complex and changing information difficult to understand and follow.</p> <p>Lack of translations or information in Easy Read from central government (only one example seen so far – 25th March).</p>	<ul style="list-style-type: none"> • Use plain English in all communications. • Be consistent. • Provide written/online information in Easy Read format. • Include an ‘alternative format statement’ in all correspondence. • Provide information in foreign language on request or if it is known the person requires it. • Ensure call centres have access to, and know how to use, a foreign language telephone interpreting service. <p>Promote any government/official guidance that is provided in alternative formats/languages, for example:</p> <p>https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance</p> <p>https://campaignresources.phe.gov.uk/resources/campaigns/101/resources/5080 Hand washing guidance in Easy Read, Larger</p>

		<p>Print and BSL</p> <p>https://www.gov.uk/government/publications/covid-19-guidance-on-social-distancing-and-for-vulnerable-people</p> <p>https://www.doctorsoftheworld.org.uk/coronavirus-information/# Information in more community languages, matches NHS guidelines and they are currently translating the Stay at Home guidance too</p> <p>DCC provision:</p> <p>DCC uses Language Line Telephone Interpreting Services and Multilingua for local face to face interpreting.</p> <p>Multilingua have recently provided Skype sessions and in the process of introducing conference calling.</p> <p>Alternative Format Statement.</p> <p>DCC Easy Read website about coronavirus: http://www.learningdisabilitydevon.org.uk/resources-category/coronavirus-information-to-help-you-stay-safe/</p> <p>Further information about alternative formats: https://inside.devon.gov.uk/task/providing-alternative-formats-and-communication-support/</p>
<p>Neurodiversity and all groups with communication difficulties</p>	<p>Lack of direct instruction and use of metaphor unhelpful. Inconsistencies in messages can be confusing. There have been numerous cases of information</p>	<ul style="list-style-type: none"> • Use plain English. Be direct – don't shy away from giving people firm instruction. • Stick to the script. • Be consistent and avoid changing messages without being clear of the reasons for the change.

	<p>being changed slightly – for example “avoid all non-essential contact and travel” became “avoid all contact and non-essential travel” on BBC Spotlight. These subtle changes in the message can cause confusion.</p> <p>Changes between 7 day and 14 day isolation has confused people as has “essential work”, “travel to work when it can be done at home” and “critical work”.</p>	<ul style="list-style-type: none"> • Ask that news/media follow these principles too. <p>Resources: https://www.dimensionsforautism.life/devon-autism-guide</p>
<p>Neurodiverse people/autistic people</p>	<p>Disabled people find change in routine particularly difficult.</p> <p>For autistic people, change can be traumatic. For example, autistic people are selective eaters and panic buying has resulted in certain food items becoming unavailable. This will create stress not only for an autistic person but also their parent/carer or people living with them.</p> <p>They may also be selective about who they speak to and prefer to have the same care worker/point of contact.</p>	<p>Carefully consider who will be a point of contact for neurodiverse people and provide training where necessary in targeted support for people who are shielding.</p> <p>Find out if able to meet needs of selective eaters if distributing food parcels.</p> <p>Wellbeing support for parents/carers under strain.</p>
<p>Neurodiverse people/autistic people/dementia</p>	<p>People arrested (and released) for complex behaviour associated with the current situation (25th March - 3 in Devon to date).</p> <p>Staying indoors might not be possible and thus they are putting themselves and others at risk. But to take a punitive approach would not be helpful here either.</p>	<p>Advise the police that autistic people and especially those with ADHD may find it difficult to comply with instructions that they cannot comprehend, and because they perceive the world differently and may have very fixed thinking patterns, it is not always easy or even possible to sway their thinking.</p> <p>Advise the police to receive autism training for example, not to</p>

	<p>Those with ADHD may need a lot of exercise and may need to go out more than once a day for exercise.</p> <p>Anxiety caused from the disruption to routine is already causing people difficulty sometimes with the result of 'meltdown' which can result in verbal or physical aggression.</p> <p>Those who are not known to social care may struggle to engage with the various social networks that are being set up to support communities so are more at risk of isolation resulting in lack of essentials such as food and medication if they are ill.</p> <p>It will be difficult for some care homes with specific resident groups such as learning disabilities / dementias to adhering to isolation advice and policies, some residents will not understand / comply with the advice.</p>	<p>touch someone having a meltdown.</p> <p>Work with autistic/ADHD people to try and help them understand that what they consider important might not be so important in the current circumstances.</p>
Deaf/hard of hearing	<p>Encouraging/use of phone contact during social isolation – not suitable for people with profound/severe hearing loss.</p> <p>Facemasks are problematic for people who lip read.</p>	<p>Provide alternatives. For example, suggesting people write a letter, provide stamps and opportunity to use postal worker to collect letters, provide information on safe contact with paper (virus can stay on paper/card for 24 hours).</p> <p>Provide SMS and email contact routes.</p> <p>Provision of clear face masks needed.</p> <p>Hearing assistive technology products available to purchase via</p>

		the Action on Hearing Loss online shop.
Partially sighted/Blind	<p>Cut off because suitable means of communication not as widely available and familiar things may change and put them at risk, e.g. shop layouts, items on shelves.</p> <p>If alone, will be wary of opening door to strangers.</p>	<p>Ensure written information available in audio and large print where required, or via phone contact.</p> <p>Ensure web based information is compliant with new web accessibility legislation so that it works with screen-readers.</p> <p>Priority/first tranche group for targeted support for people who are shielding?</p>
LGBT	<p>Cohort already experience higher levels of loneliness and poor mental health.</p> <p>Intersectionality of LGBT needs to be noted.</p> <p>School/youth group closures and lockdowns could impact badly on LGBT youth – if not ‘out’ in family. Risk of isolation, self-harming etc. and unsafe online activity to socialise. Also an issue for adults in households where feel isolated from other LGBT people.</p>	<p>Help promote and support LGBT helplines and services linking up LGBT people to provide social contact over the phone/online.</p> <p>Support LGBT youth organisations to provide safe means for LGBT young people to stay in touch.</p>
All, but women and LGBT are high risk groups	<p>Increase in rates of domestic violence and abuse during shielding/lockdown.</p> <p>Could be fuelled by loss of income, increase in anxiety leading to drug/alcohol abuse and anger/frustration.</p> <p>Abusers could take advantage of victim’s reduced social interaction with others. Lockdown/shielding will be terrifying for people already in abusive relationships.</p>	<p>Maintain dialogue with DVA agencies.</p> <p>May need additional housing for DVA victims needing to isolate. Utilise empty holiday properties?</p> <p>Communications about DVA (target perpetrator behaviour as well as where to get help for victims).</p> <p>Look at innovative examples in China and Italy of utilising technology to address DVA.</p>

	<p>Women are also at higher risk of increased sexual exploitation and abuse during pandemics.</p> <p>Adolescent girls can be at increased risk of forced marriage, FGM and abuse during school closure. In some cases FGM has been used against lesbian/gay women.</p>	<p>For DCC staff:</p> <p>Remind staff and managers that they should speak to their manager if homeworking is not for them, alongside signposting to the sources of support for people experiencing DVA (this is available via the Inside Devon guide). For people who need to maintain a degree of social distancing make adjustments such as allowing staff to drive in five days a week (where car parking restrictions apply) and to book a small meeting room from which to work/be given access to a small room such as a manager's office.</p>
<p>Women, young people, neurodiverse/learning disability, homeless, mental ill health etc.</p>	<p>Possible increased risks of modern slavery/trafficking and cuckooing as fewer people out and about things may go unnoticed.</p> <p>Perpetrators will take advantage of fewer visitors to a vulnerable person's home.</p> <p>Evidence of exploitation of domestic workers in other countries – e.g. being forced to work without a break.</p>	<p>Train postal workers and delivery drivers in spotting signs as these workers remain out and about. The same action could be taken to raise awareness of safeguarding and DVA.</p>
<p>BAME (particularly Chinese or perceived Chinese)</p>	<p>Increase in hate crime</p>	<p>Support Police with messages around hate crime.</p> <p>Messages that promote positive contribution of BAME people during the crisis.</p> <p>DCC information on reporting is available at: https://www.devon.gov.uk/equality/reportincidents/hatecrime</p>
<p>BAME – asylum seekers</p>	<p>Victims with 'No Recourse to Public Funds' face additional barriers and insecurity as they cannot</p>	

	access life-saving refuges and are barred from other forms of public support.	
Dementia	Difficulties coping with change – particularly where items in shops are no longer available	Priority/first tranche for targeted support for people who are shielding?
GRT	<p>Tend not to be registered with GP. Higher levels of poor health.</p> <p>Restricted movement leads to loss of income.</p> <p>Traditional travelling season starts as virus is predicted to peak. If they do move and encamp, community tensions could be higher than usual. In addition, may not be able to evict as quickly.</p> <p>Some campervan/motorhome users (not GRT) have been travelling/setting up encampments in order to distance themselves from others. This has a negative impact by bringing the virus to rural communities which are already disadvantaged by poorer access to services. However, while sites have been closed to prevent this it should be noted that some people live permanently on the road or live between two or more sites (but don't identify as GRT) and may be forced to live in unsuitable locations such as residential roads.</p> <p>Existing GRT encampments:</p> <ul style="list-style-type: none"> • issue of access to water on site. • those on winter sites will still need to move. • site visits could put people at risk. 	<p>Targeted dialogue (nationally and locally) with GRT communities to ensure they understand what is happening and identify what support is needed for those who will need to be shielding.</p> <p>Monitor impact of holiday site closures on people permanently resident in campervans/mobile homes. If necessary, open sites in suitable areas to allow access for this cohort.</p> <p>Existing encampments:</p> <ul style="list-style-type: none"> • exploring provision of water bowsers. • reduce site visits to 'essential only' and observe social distancing rules. • only evict if absolutely necessary.

	<ul style="list-style-type: none"> • evictions will result in movement of people – could put people at risk. 	
Homeless people (not a protected group but still needs consideration – often mental health/neuro-diverse/care leavers/ex-army)	<p>More at risk of illness/ill health in general.</p> <p>Inability to self isolate/maintain social distancing.</p> <p>Difficulty in getting information and advice.</p> <p>Tensions amongst the homeless community who may have experienced a drop in income from reduced city centre footfall have been reported to Devon and Cornwall Police.</p>	<p>Targeted support via homeless charities/district housing staff.</p> <p>Availability for accommodation via empty hotels/B&Bs?</p>
Long term health condition, but not in coronavirus high risk group	Difficulties getting prescription drugs	Community support initiatives – dropping off prescriptions
Working age men	<p>Already known as a high risk group for suicide and generally poor engagement with services.</p> <p>Whilst less likely to be in the vulnerable category eligible for targeted support during shielding, the implications of mental ill health are high, particularly for those that have been negatively impacted by loss of earnings.</p> <p>Social connecting activities such as Men in Sheds and Andy's Man's Club (in Devon) will be unable to meet.</p>	<p>Support community organisations in finding alternative ways to provide wellbeing outreach/support to this cohort.</p> <p>Revisit communications campaigns such as #realmentalk?</p>

<p>BAME with families abroad (including high proportion NHS/care staff, international students)</p>	<p>Feeling trapped and isolated as unable to connect with families during reduced travel. Sources of emotional and practical support reduced.</p>	<p>Ensure BAME groups are included in district hub arrangements for targeted/community support.</p> <p>All organisations with high level BAME workforce to promote workplace wellbeing support.</p> <p>A message of acknowledgement to all staff who have families overseas during this difficult time may make people feel that we are thinking of them.</p>
<p>Mental illness/disabled/older people</p>	<p>Redeployment of other care professionals to respond to coronavirus will help save lives. But it also risks leaving already vulnerable older people and those living with mental health conditions exposed. [EHRC]</p>	<p>Redeployment to support those at risk but not life critical.</p>
<p>SEN – disability/young people</p>	<p>The reduced number of children still able to attend school will only constitute a small proportion of all children with special educational needs, and the dispensation for councils to reduce support to these pupils will have a profound impact on families.</p>	<p>Such decisions should be taken only when 'strictly necessary' and for the shortest time possible, as set out in the legislation. [EHRC]</p>
<p>BAME, young, carers.</p>	<p>The workplace has changed since the 2008 economic crisis.</p>	<p>Measures to mitigate financial hardship will be essential for gig economy workers – who still have very few protections in employment law, and are more likely to be younger, from an ethnic minority, or have caring commitments – if they must self-isolate. [EHRC]</p>
<p>Women</p>	<p>Women still bear the majority of caring responsibilities for both children and older relatives. With schools and nurseries now closing, the need for this unpaid work will only increase in the weeks to come.</p> <p>Shortage of care services (childcare, healthcare,</p>	<p>Women, including those who are pregnant and on maternity leave, should not be disadvantaged in their careers by following government advice to stay at home. [EHRC]</p>

	<p>elderly care) will have a disproportionate impact on women as providers of unpaid care work. Coronavirus will exacerbate a situation where cuts to public spending have already fallen on women. [Amnesty]</p>	
Women	<p>Screening (breast/cervical screening) lapses and will increase cancer risk further down the line. Reluctance/inability to access sexual health clinics including dealing with unplanned pregnancy.</p>	<p>Clarity over attending screening/written reminders.</p> <p>Clarity over accessing sexual health and family planning centres.</p>
Carers	<p>The clearing of hospitals to make way for coronavirus patients by releasing people early will put strain on those who will care for their partner.</p>	<p>Ensure care plans are in place and information is provided on where to get support/adaptive aids.</p>
Faith/religion and belief	<p>Excess death – ability to observe religious practice at end of life / funeral.</p>	<p>Consult with faith/belief groups on plans/policy. Check guidance such as https://religionmediacentre.org.uk/factsheets/death-funeral-rituals-in-world-religions/ but note that cremation is not acceptable under Islam. Additional information from Muslim Council of Britain: https://mcb.org.uk/community/burialfaq/ - in particular note the potential need to identify land for burial.</p>
Low income families	<p>Panic buying has had an impact on low income families who are unable to stockpile – leaving them with empty shelves when they need to pick up their essentials for the day/week. This mean them having to make more trips than usual to a shop.</p> <p>They may also be more dependent upon public transport and be in lower income jobs – some of these are essential such as caring and retail</p>	<p>Community support – foodbanks. Wider initiatives being implemented such as supermarket rationing and government support e.g. council tax relief.</p> <p>Keeping allotments open – many people on low income ‘grow their own’ and this will help maintain food supply/alleviate pressure off of shops during growing season, and contribute to good health and wellbeing. Social distancing can be enforced on allotments by asking people to stay strictly on their own plots</p>

	(groceries).	and having a safe system of unlocking the gate.
Rural communities	Rural and urban communities are very different. Social distancing is much easier to apply in a rural setting. Policies which are applied to address social distancing issues in an urban setting could have an unnecessary disproportionate economic/wellbeing impact in a rural setting.	Alert government of any policies where it could be beneficial to adapt a different approach in a rural setting.
Rural communities	Closure of car mechanics during lockdown (partly due to inability to get parts delivered and also to observe the three week lockdown fully) could negatively impact rural communities who are dependent upon their car. Although MOTs have been postponed by six months, if a car breaks down and is in need of repair this could cause problems for people who need to go shopping for food – online grocery deliveries are very difficult to get due to panic buying and capacity issues arising from a sudden shift. Likewise for accessing essential medical appointments or getting medical supplies.	
Young people	<p>Increased levels of anxiety as a result of the current coronavirus situation.</p> <p>The long term impact of prolonged isolation on young people may lead to poor mental health and wellbeing.</p> <p>Some young people don't see that they are particularly at risk and therefore may not keep themselves and others safe.</p> <p>Young people may not have access to accurate news</p>	<p>Support for organisations working with young people.</p> <p>Mental health services need to seek different ways to support young people.</p> <p>Young people's charities could/should provide accurate and up to date information for young people in a young people friendly format.</p> <p>Targeted communications from DCC about staying safe and social distancing for young people.</p> <p>See DVA above.</p>

and information and/or may become overwhelmed by false news.

Potentially online safety risks may increase as isolated young people seek entertainment online.

Homeless young people who don't see themselves at risk of the Coronavirus may not follow self-isolation guidelines, putting themselves, general public and support staff at risk.

Likelihood of increased domestic violence in the home around and/or involving young people.