

Equality Impact Assessment (EIA)

Corporate Complaints Procedure

Equality impact, needs and requirements assessment form

Please use this form to record your findings, proposed actions, equality objectives and targets. Use the guidance notes to help you do the assessment or contact the Equality Standard Project Manager if you need some advice

About the policy, practice, service or function you are assessing

Name of policy, practice, service or function: Corporate Complaints Procedure

Assessment team leader name: Pauline Campbell

Date of assessment: June 2007

Department responsible: Corporate and Adult Services Service Area: Democratic Services

Other members of assessment team:

Name	Position	Area of expertise	Comments
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Sarah Turner	Electoral Services Officer		
Ken Richardson	Parks Manager		
Jane Coates	Electoral Services Officer		
Ann Webster	Equality Standard Project Manager		
Cherry Hayes	Team Administrator- Complaints and Scrutiny		

Question	Response/ findings
<p>What are the main aims and objectives or purpose of the policy, practice, service or function that you are assessing?</p>	<p>The Council has a procedure that aims to:</p> <ul style="list-style-type: none"> • Make it simple and straightforward for customers to complain about Council services • Demonstrate to the customer that their complaint has been properly investigated, even if the outcome is not to uphold the complaint. • Keep customers informed of the progress of their complaint • Ensure the Council learns and improves from complaints • Ensure that complaints are responded to within a reasonable timescale.
<p>Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person, team, department, or body – and include any outside organisations who deliver under procurement arrangements</p>	<p>All Council officers, members and contractors</p>
Question	Response/ findings

<p>Who is affected by the policy, practice, service or function, or by how it is delivered? Such as, who are the external and internal customers, groups, or communities?</p>	<p>All residents and visitors to the City.</p> <p>Anyone that uses a Council service, including business, community groups and employees.</p>
<p>What outcomes do we want to achieve, why and for whom? For example, what do you want to be providing, how well, what changes or improvements, and what should the benefits be for customers, groups or communities?</p>	<p>We want people to know how to complain and be satisfied with the process.</p> <p>We want to be an organisation that learns from complaints and improves our services.</p>
<p>Question</p>	<p>Response/ findings</p>

<p>What existing or previous inspections of the policy, practice, service or function are there? For example, Best Value Inspections, policy reviews, research into the effects of a policy or practice.</p> <p>What did they tell you?</p>	<p>In November 2005 Derby City Council's Pointer Panel showed that 40% of complainants were satisfied with the way their complaint was handled.</p> <p>The report from the General BVPI 2006 Survey for Derby City Council states: "It may be worth monitoring the way minority groups' complaints are handled over time; although not a <i>statistically significant</i> finding, Asian respondents who have complained to the Council are more likely to be dissatisfied with the outcome than white respondents. Asian respondents are more likely to contact the Council in person than other groups, and this may be a factor in the above finding, especially if the general Council approach is to focus on telephone and e-mail communication paths."</p> <p>It should however be noted that this comment also relates to complaints that were not dealt with under the Corporate Complaints procedure</p> <p>The General BVPI 2006 Survey for Derby City Council shows that overall satisfaction with complaint handling was at 31%, which is just below the average score for Unitary Councils.</p> <p>The BVPI Survey also showed that men were more likely to be dissatisfied with complaint handling than women</p>
<p>Identifying potential equality issues and factors</p>	

Question	Response/ findings
<p>What do you already know about the equality impact or need? For example, from research, feedback, consultation or any performance monitoring</p>	<p>Between November 2005 and March 2006, the Complaints Procedure was taken to the Council's Women's, Disabled People's and Minority Ethnic Advisory Committees.). The Committees were asked for their feedback on the current procedure and for suggestions for its improvement.</p> <p>The following issues were raised:</p> <ul style="list-style-type: none"> • We need to make sure that reasonable adjustments are made to ensure there are no barriers to officers or complainants when using the procedure. • We need to change the way we investigate equality complaints • We need to waive the twelve month time limit on a customer complaints if health has been a barrier
Question	Response/ findings

<p>Is there any evidence of higher or lower take up under the policy or practice, or of the service or function for any particular groups? For example, who uses the service, who doesn't and why not?</p>	<p>There is very little information available on our complainants. We have collected information on ethnicity and disability on our complaint forms but customers do not always complete this section or make their complaint by using the forms.</p> <p>In the last two years, only 12% of complainants used the forms to inform us of their ethnic background and of that 12%, only 2% identified themselves as belonging to a recognised ethnic minority.</p>
<p>Have there been any important demographic changes or trends locally? For example is the population changing, and if so, how and what might that mean for the service or function?</p>	<p>The expansion of the European Union has meant an increase in Eastern European communities living and working in Derby.</p> <p>Derby has a significant refugee community. Iraqi Kurds, Afghans, Iranians, Zimbabweans and people from the former Yugoslav republics all have a significant presence in the city</p> <p>This may increase the need to make documents available in other languages and in more requests for interpreting services.</p> <p>The population is getting older; approximately 16% of Derby residents are over 65.</p>
<p>Question</p>	<p>Response/ findings</p>

<p>Is there an indication that any of the policies or practices involved with the service or function creates particular problems or difficulties for any groups of customers or communities?</p>	<p>The procedure is quite a long document and the process does encourage customers to put their complaints in writing. This could impact on customers with learning disabilities or whose first language is not English.</p> <p>The recent Council's General BVPI survey suggested that Asian respondents were slightly more likely to be dissatisfied with the way their complaint was handled. Although not statistically significant this must be monitored and further data is required to find out whether the same applies to complaints investigated under the Corporate Complaints Procedure.</p>
<p>What information or data exists? For example, statistics, customer feedback, complaints, research, monitoring – who keeps it and can you get hold of it?</p>	<p>We have a complaint database where we hold information on the age, disability and ethnicity of our complainants gained through the website form and the leaflet. Complainants are not however obliged to provide this information.</p> <p>We have received no complaints about the procedure.</p>
<p>Question</p>	<p>Response/ findings</p>

<p>Does any equality or diversity objectives already exist? If so, what are they and what is current performance like against them?</p>	<p>There are no equality or diversity objectives</p>
<p>Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?</p>	<p>The Complaints Procedure is thought to have a positive effect within the communities who use it because it aims to resolve concerns about Council services.</p>

Collecting the information and data about how the policy, practice, service or function, impacts on communities

Please record your information and data in this table and think about:

What information or data you will need
 Using both quantitative and qualitative data
 making sure that where possible there is information that allows all perspectives to be considered
 identifying any gaps in the information/ data and what it can tell you

Data or information	When and how was it collected?	Where is it from?	What does it tell you? You need to consider all six equality strands where you can	Gaps in information
Customer feedback and complaints	Ongoing	Complainants and Stakeholders	The procedure requires written complaints and understanding of written procedures and responses	This can be a barrier for visually impaired people, people with learning difficulties and people whose first language is not English and also for those who are not able to read or write,
Consultation and community involvement	November 2005- March 2006	Representative from community groups sitting on the Council Women's, Disabled People's and Minority Ethnic Advisory Committee	We need to make sure that reasonable adjustments are made to ensure no barriers to officers or complainants Need to change the way we investigate complaints about discrimination and harassment. We need to waive the twelve month time limit on a customer complaint if health has been a barrier	There was no consultation with groups around the impact of religion and sexuality, although there was some discussion on equality monitoring of complaints at our internal LGBT employee network

Performance information including Best Value	Best Value User Satisfaction Survey		Asian respondents were less likely to be satisfied with the outcome of their complaint than their white counterparts although this was not a statistically significant difference Men were more likely to be dissatisfied with the outcome of their complaint	This survey was not limited to users of the Corporate Complaints procedure. This survey looked at all complaints about the Council, which included housing, social services, and complaints about schools which, are investigated under different procedures.
Take up and usage data	This is collected on the paper and electronic complaint forms	Complainants	Very few customers are completing the optional personal details section of the form.	At the moment we are not recording details of religion, sex or sexuality
Comparative information or data where no local information	Not available			
Census, national or regional statistics	Not applicable			

<p>Access audits or assessments such as DDA assessments</p>	<p>At our Disabled People's Advisory Committee we were given some helpful tips on making the complaints procedure more accessible for disabled people</p>			
<p>Workforce profile</p>	<p>Where possible we try to make sure that if an equality complaint is received, investigators have experience of dealing with equality issues or have access to an appropriate advisor</p>			
<p>Where service delivered under procurement arrangements – workforce profile for deliverers</p>	<p>Not applicable</p>			

Analysing the information and data and setting equality objectives and targets

Please give your detailed findings in this table

Service or function	Policy or practice	Findings	Which groups are affected and how	Whose needs are not being met and how?
	Corporate Complaints	There are gaps in the monitoring data that we obtain from existing complainants	Sex, Sexuality, Religion	We are unable to determine the take up and satisfaction of these groups
		Customers are not completing the equalities impact monitoring section of the complaint form	Potentially any of the groups	We are unable to monitor this aspect of the use of the service

Objectives - process, impact or outcome based

Please give your proposed objectives/ targets in this table

Objective/Target:	Update the leaflet to request information about the sex of our complainants
Specific	Add tick boxes for male and female onto the complaint forms
Measurable	Yes
Achievable	Yes
Relevant	We will be able to measure the take up of the service by sex if users provide the information
Timed	March 2008

Objective/Target:	Complete consultation with customers on satisfaction and obtain information to monitor the equality impact
Specific	Send out a survey to complainants with equality monitoring information
Measurable	Yes
Achievable	Yes
Relevant	We obtain more information about usage and satisfaction if users complete the survey
Timed	October 2007

Objective/Target:	Create/ commission an 'easy read' version of the corporate complaints procedure
Specific	Yes
Measurable	Yes
Achievable	There may be problems providing the necessary information and retaining accuracy in an 'easy read' version
Relevant	This may be helpful to complainants with learning disabilities accessing the service and also for those people who use limited English
Timed	October 2008

Objective/Target:	To improve equalities impact information
Specific	Send out the equalities impact monitoring questionnaire with a prepaid envelope with the formal complaint acknowledgement where the information has not yet been provided.
Measurable	Yes
Achievable	Yes, if people return them
Relevant	We will be able to measure the take up of the service by different groups if users provide the information
Timed	March 2008

Monitoring and reviewing - incorporating into performance management

Please summarise your objectives and targets in this table with your proposed monitoring and reporting arrangements

Objective	Planned action	Target performance			Responsible lead officer	Reporting cycle, for example, quarterly
		2007/8	2008/9	2009/10		
<p><i>Obtain more information about take up and satisfaction rates within different communities.</i></p>	<p><i>Send out a satisfaction survey to complaints with equality monitoring questions</i></p> <p><i>Collect information about Gender on complaints forms</i></p> <p><i>Send out the equalities impact monitoring questionnaire and a prepaid envelope with the formal complaint acknowledgement where the information has not yet been provided.</i></p>	<p><i>October 2007</i></p> <p><i>March 2008</i></p> <p><i>March 2008</i></p>			<p><i>Pauline Campbell</i></p>	<p><i>COG Quarterly</i></p>

<i>Improve Access to the service for customers with learning disabilities or whose first language may not be English</i>	<i>Create/Commission an 'easy read' version of the complaints procedure/leaflet</i>		<i>October 2008</i>		<i>Pauline Campbell</i>	<i>COG Quarterly</i>
<i>Prepare for reassessment of the Complaints Procedure</i>	<i>Review EIA and action plan in preparation for next version</i>			<i>March 2010</i>	<i>Pauline Campbell</i>	