

EQUALITY SCREENING

Equality Impact Assessment guidance should be considered when completing this form.

POLICY/FUNCTION/ACTIVITY	LEAD OFFICER
Complaints Policy 2024	Mario Leo

A. What is the aim of this policy, function or activity? Why is it needed? What is it hoped to achieve and how will it be ensured it works as intended? Does it affect service users, employees or the wider community?

The Council's corporate Complaints Policy is aimed at facilitating the resolution of complaints about the Council, or a Council service, whether provided by ourselves or another party/contractor. The Council must have a policy for dealing with complaints in a fair and consistent way which is accessible, straightforward and transparent and not overly bureaucratic for the person making a complaint or an administrative burden to the Council. The Policy also aims to ensure we learn from complaints to improve our policies and procedures.

Performance monitoring is built into the Council's complaints policy; this includes a set of key performance Indicators, the requirement to produce an annual report and annual self-assessment which can be used internally and externally to assess how the policy is operating.

Feedback is welcomed to ensure the policy is working as intended. Complaints are currently recorded centrally with access for nominated staff to make entries in the register and regularly monitored by the Standards and Audit Committee.

Colleagues in Digital Services are about to 'soft launch' new software in Jadu to host the Council's complaints data and provide an audit trail of how complaints have been dealt with. The new software is aligned with the principles of the Local Government and Social Care (The Ombudsman) and Housing Ombudsmen's codes of complaint handling applicable to all public authorities and Local Authority Social landlords from April 2024.

The Complaints policy affects staff, Councillors and everyone that interacts with the Council from residents to contractors and partners.

Staff are made aware of the complaints policy via information and guidance on the staff web pages and through training for stage one and stage two complaint handlers, initially to be provided by the local government ombudsman and other staff are given guidance regarding how it operates and how they are recorded.

B. Is this policy, function or activity relevant to equality? Does the policy, function or activity relate to an area in which there are known inequalities, or where different groups have different needs or experience? Remember, it may be relevant because there are opportunities to promote equality and greater access, not just potential on the basis of adverse impacts or unlawful discrimination.

The Protected Characteristics are; Sex, Age, Disability, Race, Religion and Beliefs, Sexual Orientation, Marriage and Civil Partnership, Gender Reassignment, Pregnancy and Maternity.

Anyone may make a complaint and this will likely to include people with protected characteristics. The Complaints policy is applied to all regardless of any protected characteristic; people with a protected characteristic which might make it difficult to engage in the process can be assisted with making a complaint and there is a specific

reference to this both in the Ombudsman's code and our own guidance.

In terms of recording where a reasonable adjustment has been made there is an option to record this in Jadu and this will be part of the suite of performance monitoring tools. Our complaints policy asks complaint handlers to take a pro-active approach in finding out if the customer needs any assistance with making their complaint.

We welcome the participation of an advocate who may be helping someone make a complaint if they have given consent for/to that person to act on their behalf and we are satisfied that they are acting in their best interests.

We accept complaints via various channels; in person, by telephone, in written format and via the website using an on-line complaints form.

The Complaints policy is a flexible two stage process and follows guidance issued by the Ombudsman to whom a complaint can be made should someone be dissatisfied with the way the Council has handled their complaint. They can now complain to the Ombudsman at any stage of the process.

The Standards and Audit Committee receives regular anonymised reports on complaints including data where it is possible to identify where a complaint engages one or more protected characteristics.

Runnymede's population is recorded as approximately 88,000 of whom approximately 6,000 live in Council owned properties covered by the Housing Ombudsman. Some of the Council's Services (apart from Housing) by nature deal with a disproportionate number of people with protected characteristics. For example Disabled Facility Grants, Home Improvement Agency, Home Safe and Home Safe Plus, Careline, Social Prescribing, Community Transport, and Community Safety. In terms of complaints made by people and referring to a protected characteristic mainly tends to be regarding age, disability and race.

In 2023/24 there were 156 complaints reported, of which 17 were relevant to one or more of the protected characteristics of age and/or disability, race, and religion and belief because the people were disproportionately affected because of these factors.

However, no complaint outcomes have suggested that the Council has acted in a way that was discriminatory towards someone with a protected characteristic.

Conversely, in 2023/24 the Council recorded 78 compliments of which 10 were relevant to the protected characteristics of age (young and older people), and/or disability. The people making compliments had referred to a protected characteristic.

By asking for feedback on how the Council has dealt with a complaint, equalities information is requested and this might help identify any gaps or where people with protected characteristics are disproportionately affected which would in turn inform the annual review of the policy and when reporting on the relevant KPIs.

We are not required to report on where reasonable adjustments have been made but recording the information may help our service provision.

If the policy, function or activity is considered to be relevant to equality then a full Equality Impact Assessment may need to be carried out. If the policy, function or activity does not engage any protected characteristics then you should complete Part C below. Where Protected Characteristics are engaged, but Full Impact Assessment is not required because measures are

in place or are proposed to be implemented that would mitigate the impact on those affected or would provide an opportunity to promote equalities please complete Part C.

C. If the policy, function or activity is not considered to be relevant to equality, what are the reasons for this conclusion? Alternatively, if it is considered that there is an impact on any Protected Characteristics but that measures are in place or are proposed to be implemented please state those measures and how it/they are expected to have the desired result. What evidence has been used to make this decision? A simple statement of 'no relevance' or 'no data' is not sufficient.

The procedures carried out in pursuance of this policy do not require a Full Impact Assessment. The basis for this decision is as follows;

When the Ombudsmen issued their consultation on the new complaint handling code (there was an aspiration for one single code at that stage which subsequently reverted to having two separate but aligned codes) they conducted an Equality Impact Assessment which has been used as a reference point for this screening assessment. In terms of consultation, the Ombudsman consulted the Citizens Advice Bureau and Shelter as recognised organisations representing people with protected characteristics. The Council's complaints policy follows this code so there is an extra layer of confidence that mitigation measures and our public sector equality duty is being met.

The Ombudsman referred to transparency and predictability of the process as being something that should make it easier for everyone to understand, which would also make the process accessible to all in terms of making a complaint and for staff dealing with them.

There is a specific section in the Council's policy and guidance for the consideration of Equalities issues and implications in the context of our public sector equality duty.

Complaints are considered on a case by case basis, and there are, as stated above, measures in place to ensure that anyone with a protected characteristic which might affect how they engage in the process can be assisted either directly or through an advocate.

Our policy and guidance require complaint handlers to anticipate where an adjustment might be needed and to make such reasonable adjustments in order to resolve the complaint.

We are able to deal with a third party advocate if the customer wishes or needs for this adjustment and the third party has their explicit consent to do so and they are acting in their best interests. Confirmation of this is built into the process and guidance for complaint handlers and staff generally.

There is flexibility to respond to complaints in the way preferred by the customer. For example by telephone, face to face, via email, letter or other format if requested.

The Policy has been drafted with accessibility in mind and is available in other formats including online which meets screenreader requirements. The Council's website has a high rating for accessibility as evidenced by the website accessibility report planned for submission to Corporate Management Committee in June 2024.

We have a communications plan in place to promote the new complaints policy internally and externally, staff have equalities training and in the context of handling

complaints. Other equalities training and other policies raise awareness amongst staff which can be applied when handling complaints.

The software has been constructed with accessibility in mind, with an emphasis on plain English and improving the customer experience.

The complaints policy should be read in conjunction with the Council's Customer First Strategy which was subject to a full impact assessment.

This screening assessment will need to be referred to the Equalities Group for challenge before sign-off.

Date completed: 5 June 2024

Sign-off by senior manager: