

Equality Impact Assessment Template

To complete the template, please refer to the Equality Impact Assessment Process & Guidance Notes. Section 5 (5.1 to 5.8) in pages 11 to 17 provides a step-by-step guide on how to carry out initial, partial and full impact assessments.

- (1) The General Information section must be completed in all assessments.
- (2) For an Initial Impact Assessment, complete Sections 1 - 4
- (3) For a Partial Impact Assessment, proceed to complete Section 5
- (4) For a Full Impact Assessment, proceed to complete Sections 6- 8

General Information	
Name of function/policy: Complaints Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: 28/08/08	
Is this an existing or proposed function/policy? Existing	
Initial Impact Assessment (Sections 1- 4)	
Section 1. Responsibility and Ownership (refer to 5.1 in pages 11 & 12 in guidance notes)	
1.1 Who is responsible for this function/policy at senior management level? (this could be a named individual or a group e.g. DEG) Head of Business Support	
1.2 Who is responsible for this function/policy on a day-to-day basis? (this could be a named individual or a group) Customer Relations Manager	
1.3 Who else, both internally and externally, influences delivery of this function/policy? All staff and contractors working for PCHA	
Section 2. Aims and Objectives of the Function or Policy (refer to 5.2 in page 12 in guidance notes)	
2.1 What are the aims and objectives of this function/policy? This procedure aims to ensure that all complaints are effectively captured, investigated and managed. PCHA will aim to use complaints to positively impact on services, identifying any areas of weakness in service delivery and taking the	

necessary steps to initiate service improvements. The complaints process outlined in this procedure aims to be simple, fair, and accessible to all residents.

2.2 Who are the target groups that will benefit from this function/policy?
All residents and stakeholders.

2.3 What are the intended outcomes of this function/policy?

- Effectively managing and monitoring complaints
- Improving service delivery and resident satisfaction
- Ensuring that staff and contractors are adequately trained in complaints management

Section 3. Relevance to the General Duty:

- **Eliminating Unlawful Discrimination,**
- **Promoting Equality of Opportunity, and**
- **Promoting Good Community Relations**

(refer to 5.3 in pages 12 - 15 in guidance notes)

The following questions may help to guide relevance to the General Duty :

- Is the policy/function directly or indirectly discriminatory? Refer to Guidance Notes Section 5.3.1 in page 13 for definition of discrimination.
- Is the policy/function intended to increase equality of opportunity by implementing positive action to redress disadvantages? Is this lawful?
- Is the policy/function likely to result in different outcomes for different groups? How the impacts affect relation between groups or between Genesis and different community groups?

3.1 Is there any evidence that this function/policy may have/has had positive, adverse or neutral impact upon the General Duty on the following groups of people:

examples of evidence - monitoring/performance data, surveys, evaluation reports, census, consultation findings, inspection reports, partner organisations data etc.

examples of adverse impact – lower success rates in allocating/selecting process, eligibility criteria which disadvantage any groups, access denied/difficult compared to other groups, poorer quality of service/information etc

	Positive	Adverse	Neutral
	Yes/No	Yes/No	Yes/No
3.1.1 Ethnic Groups	X		
List the evidence: Use of language line services, translation services for written documents upon request. Accept complaints from advocates/those speaking on behalf of the resident. Gaps: Need to analyse complaints received by diversity strands to assess any potential impact on diversity. This data is not currently available.			
3.1.2 Gender (including transgender)	X		
List the evidence: We publicise the complaints procedure widely to all residents, for example through the website, resident newsletters, handbooks and leaflets. We also accept complaints in a range of formats, for example over the phone where this is necessary. This ensures that all residents have equal access to use the complaints procedure.			

<p>Gaps: Need to analyse complaints received by diversity strands to assess any potential impact on diversity. This data is not currently available.</p>	
<p>3.1.3 Disability</p>	<p>X</p>
<p>List the evidence: The complaints procedure is available in different formats, for example large print and Braille. PCHA will also accept complaints from advocates/people speaking on behalf of the resident.</p> <p>Gaps: Need to analyse complaints received by diversity strands to assess any potential impact on diversity. This data is not currently available.</p>	
<p>3.1.4 Age</p>	<p>X</p>
<p>List the evidence: We publicise the complaints procedure widely to all residents, for example through the website, resident newsletters, handbooks and leaflets. We also accept complaints in a range of formats, for example over the phone where this is necessary. This ensures that all residents have equal access to use the complaints procedure.</p> <p>Gaps: Need to analyse complaints received by diversity strands to assess any potential impact on diversity. This data is not currently available.</p>	
<p>3.1.5 Sexual orientation</p>	<p>X</p>
<p>List the evidence: We publicise the complaints procedure widely to all residents, for example through the website, resident newsletters, handbooks and leaflets. We also accept complaints in a range of formats, for example over the phone where this is necessary. This ensures that all residents have equal access to use the complaints procedure.</p> <p>Gaps: Need to analyse complaints received by diversity strands to assess any potential impact on diversity. This data is not currently available.</p>	
<p>3.1.6 Religion or belief</p>	<p>X</p>
<p>List the evidence: We publicise the complaints procedure widely to all residents, for example through the website, resident newsletters, handbooks and leaflets. We also accept complaints in a range of formats, for example over the phone where this is necessary. This ensures that all residents have equal access to use the complaints procedure.</p>	

Gaps: Need to analyse complaints received by diversity strands to assess any potential impact on diversity. This data is not currently available.		
3.2 Is there any evidence to believe that some or all of the groups in 3.1.1 – 3.1.6 could be differently affected by the function/policy?		
	Yes/No	Not Sure
		X
Please specify: We need more data to be sure of the impact of the procedure.		
3.3 What are the risks and/or benefits to the Genesis Housing Group of the positive or adverse impacts identified above? Please specify.		
Risks: There are gaps in the monitoring information as this is not currently available, therefore if the complaints procedure was having an adverse impact on a particular group of people we would not necessarily be aware of this.		
Benefits: We have undertaken to publicise the complaints procedure widely, therefore all residents should be aware of how to complain. We have sought to maximise access to the complaints procedure by putting in a wide range of measures such as translation services, tailoring reporting to meet specific needs, making information available in a range of formats and reporting to residents on key performance indicators to ensure that the process is open and PCHA is accountable.		
Section 4. Assessment of Equality Impact (refer to 5.4 in pages 15 – 16 in guidance notes)		
4.1 It is possible to determine the equality impact of the function/policy by answering the following questions:		
	Yes	No
4.1.1 Is any of the adverse impacts identified in 3.1.1 – 3.1.6 justified?		N/A
4.1.2 Is the differential treatment identified in 3.2 significant and justifiable in the wider policy objectives?		N/A
4.1.3 Is the risk identified in 3.3 justified?		X
4.2 If any of the answers in 4.1.1 to 4.1.3 is 'no', is there a better opportunity to meet the General duty by amending the function/policy?		
	Yes	No
	X	
4.3 This next stage of assessment for this function/policy is: (please choose either 4.3.1, 4.3.2 or 4.3.3)		
<ul style="list-style-type: none"> • If any of the answers in 4.1.1 to 4.1.3 is 'no', then a partial assessment should be undertaken. • If additional evidence will be needed in order to support the amendments in Section 5, and an action plan is also needed in order to implement the amendments, then proceed to a full assessment 		
	Yes	No
4.3.1 It will not be assessed further but will continue to be monitored		X
4.3.2 It will proceed to a partial assessment (Section 5)	X	
4.3.3 It will proceed to a full assessment (Sections 5 to 8)		X

Partial Impact Assessment		
Section 5. Consideration of Alternatives (refer to 5.5 in page 16 in guidance notes)		
5.1 What amendments are proposed for this function/policy in order to mitigate the adverse impacts or for positive impacts?		
Amendments	Who By	When by
Need to ensure that diversity information is collected and analysed in order to determine whether any groups are adversely affected by the operation of the complaints procedure. This should be in the form of monthly reports to be sent to Cate Stone and Charlie MacDonald.	Customer Relations Manager	Monthly, from operation of the procedure
Diversity reports need to be assessed for any potential adverse impact on particular groups.	PCHA Diversity Champion and Service Improvement Officer	Monthly, upon receipt of the diversity report
Review/update the Complaints Form to ensure that PCHA are collecting all the necessary diversity information.	Customer Relations Manager	End October 2008
Review how Complaints Procedure is published; collect documents in which complaints information is published to residents	Policy Officer	End October 2008
5.2 Will more evidence be needed for supporting the amendments?		
	Yes	No
		X
5.3 If 'yes', what the additional evidence will be?		
5.4 How will the additional evidence be acquired? (e.g. through consultation, commission new research etc)		
5.5 Will experts or partners be involved in the assessment at this stage?		
	Yes	No
		X
5.6 If 'yes', who are they? What are their roles?		
5.7 The next stage is to decide whether a full assessment will be necessary. This decision can be based on the answers to the following questions:		
	Yes	No
5.7.1 Has significant adverse impact on some groups of people been identified in 3.1.1 – 3.1.6?		X
5.7.2 Will significant amendments (refer to 5.1) be needed to mitigate the adverse impacts, without affecting the policy's overall aims?		X

Action required: Need to complete data monitoring, but this only requires a minor amendment to the procedure in order to mitigate any potential (and unknown) negative impact.						
5.7.3	Could the adverse impact result in unlawful discrimination?		X			
5.7.4	Could the adverse impact hinders equality of opportunity?		X			
5.7.5	Could the adverse impact lead to tension between different groups?		X			
5.8	Based on the evidence gathered in 5.71 to 5.75, will this function/policy be subject to a full assessment?					
		Yes	No			
			X			
5.8.1	Date by which the Full Impact Assessment will be completed: N/A					
5.8.2	Officer responsible for carrying out the Full Impact Assessment: N/A					
Full Impact Assessment						
Section 6. Action Plan for Implementing Proposed Changes to the Function or Policy within the next 12 months (refer to 5.6 in page 16 in guidance notes)						
Action	Target Group	Intended Outcome	Monitoring Arrangement	Responsible Officer	Completion Date	Action Completed Yes/No
Issues to be considered:						
Is the action relevant to the: - policy/function - business objectives/priorities	- Will the action have the same impact on all target groups - will another group be adversely affected?	- Is the intended outcome clear? - Will the intended outcome address all the concerns? - Any potential unintended impacts?	- Can the action be monitored within existing systems? - Are changes to existing monitoring systems required?	Who will be responsible for : - implementing action - monitoring action - overall policy development at senior management level?	When the action will be carried out & monitoring completed?	
Section 7. Consultation on Action Plan (refer to 5.7 in page 16 in guidance notes)						
7.1 Groups that have been consulted:						
<u>Groups Consultation</u>	Ethnicity	Gender	Disability	Age	Sexual Orientation	Religion/Belief
How consultation is carried out?						

When consultation is done?						
How many people are consulted?						
Which organisations are consulted?						
Consultation findings						
7.2 Amendments or changes, if any, proposed as a result of consultation.						
7.3 When the amendments will be carried out? By who?						
Section 8. Publication of Results of Assessment, Consultation and Monitoring (refer to 5.8 in page 17 in guidance notes)						
8.1 How the results will be published?						
Method (e.g. Genie, customer newsletters)					Date	
8.2 Will access and language issues be considered? If yes, how?						

Name of officer completed this assessment: Jenny Preece

Signature:

Date: 28/08/08

(Instruction : On completion of this assessment, please attach it to the function/policy and submit to the Senior Manager for approval).